

TIRELLI & WALLSHEIN

Westchester Financial Center
50 MAIN STREET, SUITE 405
WHITE PLAINS, NEW YORK 10606
PHONE (914)682-2064

Linda M. Tirelli*
Charles H. Wallshein**
Todd S. Cushner (of counsel)***

*Admitted CT, USDCCT, SDNY, EDNY and SCOTUS

**Admitted NY, USDC EDNY

***Admitted NY, USDC EDNY, SDNY, NJ

August 31, 2018

Hon. Robert D. Drain
United States Bankruptcy Judge
United States Bankruptcy Court – SDNY
300 Quarropas Street
White Plains, NY 10601
-Via Hand Delivery-

Re.: Cynthia Carssow Franklin Ch 13 Case No.: 10-20010
Supplement to Fee Application

Dear Judge Drain:

This law office represents Debtor, Cynthia Carssow Franklin, regarding her pending chapter 13 case and, now closed, adversary proceeding. All correspondence should continue to be directed to the undersigned.

On July 19, 2018, the undersigned filed and served an Amended Chapter 13 Plan to reflect the developments in the litigation against disallowed creditor, Wells Fargo, and to address concerns from the I.R.S. regarding treatment of its proof of claim (POC No. 2) in addition to the handling of other claims filed in the case, timely and untimely. I am pleased to report that all parties were served and no objections to the confirmation of Debtor's amended plan have been received.

A week prior to the filing of the amended plan, the undersigned filed a final fee application on July 12, 2018. It has come to my attention that in an effort to be diligent in the review of the timesheets and fees, I mistakenly hadn't supplemented the motion with a copy of my co-litigation counsel's fee agreement with the debtor and I also hadn't supplemented the application with the actual time records for each attorney along with expense records. I apologize for the delay and am including the missing items herewith. The undersigned's fee agreement was presented in the initial fee application but is also included here for ready reference.

Thank you for your patience and kind attention to this matter. I remain

Very truly yours,

/s/Linda M Tirelli, Esq.

Linda M Tirelli, Esq.

Debtor's Counsel

Enclosures

KELLETT & BARTHOLOW PLLC

AGREEMENT FOR EMPLOYMENT AND POWER OF ATTORNEY

THIS IS AN AGREEMENT between KELLETT & BARTHOLOW PLLC and GARVEY TIRELLI & CUSHNER, LTD. (referred to as "Attorney"), and CYNTHIA FRANKLIN (referred to as "Client"), whereby Client retains and employs Attorney to represent Client in prosecuting Client's claim(s), as follows:

PURPOSE AND SCOPE OF REPRESENTATION:

1.01 Client agrees and contracts with Attorney for the legal services to be provided for and on behalf of Client in the representation of Client. Representation is to include advising, counseling, negotiating, investigating, handling, prosecuting, and/or defending in this matter or matters to final settlement or adjudication. Attorney is hereby authorized and empowered through this Agreement to use and employ such other persons and/or entities that Attorney deems necessary for the proper handling of the matters subject to this Agreement, but shall do so only after obtaining Client's consent to such employment.

1.02 The specific subject matter of this representation is Client's disputes with Wells Fargo and Freddie Mac, and any of such creditors' predecessors, assigns, and/or successors in interest and/or any of their parent companies, subsidiaries, officers, directors, employees and/or affiliates, and any other related and appropriate defendants, (collectively, "Defendants"), regarding Defendants' filing of a proof of claim in Plaintiff's bankruptcy and litigation relating thereto.

LIMITATION OF SCOPE OF REPRESENTATION

2.01 The scope of the Attorneys' representation of the Client is specifically limited to the matters set forth in paragraph 1.02 of this Agreement. The Client does not request and the Attorneys do not agree to provide any other representation to the Client. Representation in any appeal of the court's decision in the matters set forth in paragraph 1.02 is specifically excluded from the scope of the Attorneys' representation of the Client. The Client and the Attorneys will negotiate a separate fee agreement if the Client desires representation in other matters.

POWER OF ATTORNEY

3.01 Client hereby gives Attorney Client's power of attorney to execute all documents connected with this representation, including pleadings, contracts, checks and/or drafts, settlement agreements, compromises and/or releases, verifications, dismissals and/or orders, and all other documents which Client could properly execute.

ATTORNEYS' FEES AND EXPENSES

11300 NORTH CENTRAL EXPRESSWAY, SUITE 301 • DALLAS, TEXAS • 75243
PHONE: 214-696-9000 • FAX: 214-696-9001

Cynthia Franklin

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CLIENT RESPONSIBILITIES

6.01 Client agrees to make a full and honest disclosure to the Attorney of all facts relevant to Client's case, including new facts that may arise during the course of the case. Client will keep the Attorney informed of Client's current address and telephone numbers.

6.02 Client understands that Client has the responsibility to keep the Attorney informed of any significant changes in circumstances, including any changes in financial condition. Client will promptly inform the Attorney if Client should receive any settlement offers, documents or other communications directly from Defendant(s) or any third parties in regards to this matter. Client understands that Attorney, as counsel, is to conduct all communication on Client's behalf with regard to this matter. Client agrees that Client will immediately terminate any communication Client might receive from Defendant(s)'s attorneys.

6.03 Client understands that Client may have to appear in court, produce documents, attend depositions, and attend arbitration or mediation. Client will assist, and cooperate with the Attorney to the fullest extent possible in Attorney's representation of Client's interests in this matter.

6.04 Client further understands that it may be necessary for Client to appear in court and/or sign affidavits indicating Client's express approval of Attorney's fees and Costs incurred in connection with this matter. Client agrees to appear in court and affidavits to make any court appearances and to execute any affidavits that may be necessary to obtain court approval of Attorney's fees and Cost in this matter.

FAVORABLE OUTCOME NOT GUARANTEED

7.01 CLIENT UNDERSTANDS THAT ATTORNEY HAS MADE NO REPRESENTATION CONCERNING THE SUCCESSFUL TERMINATION OF THE CLAIM OR CLAIMS RELATING TO THE MATTER IN CONTROVERSY OR THE FAVORABLE OUTCOME OF ANY LEGAL ACTION THAT IS OR WILL BE FILED, AND HAS NOT GUARANTEED THAT ATTORNEY WILL OBTAIN REIMBURSEMENT TO CLIENT OF ANY OF THE FEES, COSTS, AND/OR EXPENSES INCURRED BY CLIENT IN THE PROSECUTION OF DEFENSE OF SAID CLAIM OR CLAIMS. CLIENT FURTHER EXPRESSLY ACKNOWLEDGES THAT ALL STATEMENTS BY ATTORNEY ON THESE MATTERS ARE STATEMENTS OF OPINION ONLY.

TERMINATION

8.01 Client understands that it is free at any time to discharge Attorney from representing it by written letter. However, if Client chooses to discharge Attorney, Attorney is under no

Cynthia Franklin

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4.01 Attorneys' time will be billed at the rates between \$250 per hour to \$500 per hour. Law clerks' and legal assistants' time will be billed at rates between \$75 and \$200 per hour. The time expended by the attorneys will be recorded and billed to Client in minimum tenths of an hour increments.

4.02 The hourly rates set forth in this Agreement may be adjusted from time to time to the Attorneys' hourly rates currently in effect.

4.03 In addition, Attorney may retain additional personnel, and such personnel will bill at hourly rates set forth above.

4.04 The recordation of time by Attorney shall apply to legal research, drafting of pleadings, conferences, telephone conversations, preparation of discovery, investigation of facts, preparation for and appearances in court, and other tasks necessary to adequately handle the matter in controversy.

4.05 Court costs, deposition costs, duplication costs, telecopier fees, filing fees, runner and travel expenses, long-distance telephone expenses, accountant's fees, mediation costs, appraiser's fees and costs, consultant's fees and costs and other professional fees and costs incurred on Client's behalf (including specialized or local legal counsel), and other disbursements will be paid directly by Client or, when advanced by Attorney, will be borne by and paid for by Client.

4.06 Client agrees that the fees and charges set out above shall be deducted from any settlement or award to Client, if still outstanding.

4.07 Attorneys will attempt to obtain payment of their fees and expenses from Defendants. However, at all times, Client remains responsible for payment of the fees and expenses. Because Client is in a Chapter 13 bankruptcy proceeding, all attorneys' fees and expenses must be approved by the Bankruptcy Court before payment by the Trustee and/or Client.

4.08 Client authorizes Attorney to take Attorney's fees either in cash or in structured payments as Attorney deems appropriate.

APPROVAL NECESSARY FOR SETTLEMENT

5.01 No settlement of any nature shall be made for any of Client's claims without the complete approval of Client. Client understands that Attorney may be required by law to first obtain the Bankruptcy Court's approval of any settlement agreement, including Bankruptcy Court approval of the portion of any settlement proceeds that may be used to satisfy Attorney's fees and costs incurred in representing Client in this matter

Cynthia Franklin

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obligation to find a replacement or to continue representation of Client. Client understands that discharging Attorney does not relieve Client of Client's obligation to pay Attorney's fees and expenses incurred prior to discharge, subject to any necessary court approval.

8.02 Client agrees that Attorney may, subject to their ethical obligations and any required court approval, seek to terminate its involvement in Client's case:

- a) If, after full investigation of the facts and research of the law, Attorney decided that the claim should not be pursued further, Attorney may return the file to the Client. In such an event, the Client releases Attorney from further action on the claims, and discharges Attorney from this contract, without further liability on the part of Attorney to Client.
- b) If (i) the facts of Client's case are found to be materially and significantly different than Client has stated them, (ii) Client unreasonably fails to cooperate in the matter or follow our advice on a material matter, or (iii) if any facts are circumstances would, in our view, render our continuing representation unlawful, unethical or impractical. If Attorney terminates its involvement in Client's case under any of the circumstances set forth in this paragraph 8.02(b), Client agrees that Attorney will retain Attorney's right to recover Attorney's costs and the market value of Attorneys' legal services from Client. If we elect to terminate this Agreement under this paragraph 8.02(b), you will take all steps necessary to free us of any obligation to perform further, including the execution of any documents necessary to complete our withdrawal. Termination of our engagement under this paragraph 8.02(b) in no way affects your obligation to pay fees and expenses incurred pursuant to the terms of this Agreement.

TEXAS LAW TO APPLY

9.01 This Agreement shall be construed in accordance with the laws of the State of Texas. All obligations of the parties are performable in Dallas County, Texas.

LEGAL CONSTRUCTION

10.01 If any one or more of the provisions contained in this Fee Agreement shall be held to be invalid, illegal, or unenforceable in any respect, such invalidity, illegality, or unenforceability shall not affect any other provision, and this Fee Agreement shall be construed as if such invalid, illegal, or unenforceable provision did not exist.

Cynthia Franklin

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PRIOR AGREEMENT SUPERCEDED

11.01 This Agreement constitutes the only agreement between the parties. It specifically supersedes any prior understandings or written or oral agreements between the Client and the Attorney in connection with the Grievance.

ENTIRE AGREEMENT OF THE PARTIES

12.01 This contract embodies the entire agreement of the parties with respect to the matters in this Agreement, and it is agreed that this contract may not be modified or revoked unless by written agreement signed by both parties, with a copy being attached and made a part of this Agreement. FURTHER, CLIENT ACKNOWLEDGES THAT IN ADDITION TO CLIENT HAVING READ THIS AGREEMENT IN ITS ENTIRETY, THE UNDERSIGNED ATTORNEY HAS ANSWERED ANY QUESTIONS CONCERNING THE AGREEMENT RAISED BY CLIENT AND CLIENT UNDERSTANDS THE AGREEMENT AND CONSIDERS IT TO BE FAIR AND REASONABLE.

NOTICE TO CLIENTS


Texas law requires that all attorneys provide their clients with the following notice about the existence of the attorney grievance process: "The State Bar of Texas investigates and prosecutes professional misconduct committed by Texas attorneys. Although not every complaint against or dispute with a lawyer involves professional misconduct, the State Bar's Office of Chief Disciplinary Counsel will provide you with information about how to file a complaint. Please call 1-800-932-1900 toll-free for more information."

THIS CONTRACT IS SIGNED as of December 7, 2016.

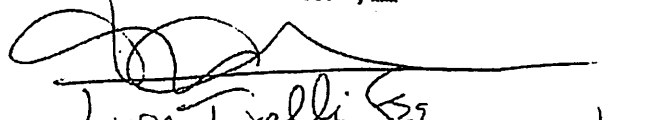
CLIENT:


Cynthia Franklin

ATTORNEY:


KELLETT & BARTHOLOW PLLC

By: Theodore O. Bartholow, III


James Tirelli Esq.
Garvey Tirelli & Cestaro LTD

THE LAW OFFICES OF LINDA M. TIRELLI, PC

1100 SUMMER STREET, THIRD FLOOR • STAMFORD, CT 06905

PHONE (203)653-2203 • FAX (914)946-0870 • EMAIL WESTCHESTERLEGAL@AOL.COM

-All correspondence and service MUST be addressed to the White Plains NY Office-

Linda M. Tirelli*

* Admitted CT and SDNY

White Plains, NY Office
(By Appointment Only)
202 Mainaroneck Ave., 3rd Floor
White Plains, NY 10601
(914) 946-0860

CONTRACT FOR CHAPTER 13 BANKRUPTCY SERVICES

This Agreement is executed this the 16th day of July, 2010, by and between The Law Offices of Linda M. Tirelli (the Attorney) and Cynthia C. Franklin (the Debtor). The parties agree as follows:

1. Type of Bankruptcy.

Debtor retains attorney to file a Chapter 13 bankruptcy case. If the Debtor determines at a later date that the Debtor desires to file a Chapter 7 bankruptcy case, the parties shall execute a new fee contract setting forth the terms of such representation. If Debtor elects to convert the Chapter 13 case to a Chapter 7 case, then Attorney shall be under no duty to prepare and file the necessary court papers until the new fee agreement has been signed and the agreed upon fees paid.

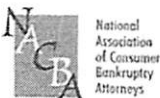
2. Base Attorney Fees.

The base attorney fee for filing the Chapter 13 bankruptcy case is \$5000.00. The base fee shall be as follows: the sum of \$4000 is due on August 16, 2010 and the sum of \$1000 is to be paid as an "up front" payment in part prior to filing. The services of the attorney included in the base fee are those normally contemplated for a Chapter 13 case. They include the services listed below:

- (a) Preparation and electronic filing of petition, schedules, supplemental local forms, Chapter 13 Plan and mailing matrix.
- (b) Drafting and mailing notice to creditors advising of filing of case, including a copy of your Chapter 13 Plan.
- (c) Drafting and mailing to you a letter regarding your attendance at the Section 341 meeting and your other responsibilities.
- (d) Preparation for and attendance at Section 341 meeting.
- (e) Review of order confirming plan and periodic case status reports from the Chapter 13 trustee.
- (f) Review of trustee's motion for allowance of claims.
- (g) Maintaining custody and control of case files.
- (h) Service of orders on all affected parties.
- (i) Verification of your identity and social security number.
- (j) Defending objections to confirmation of your Chapter 13 Plan.

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*The Law Offices of Linda M. Tirelli and Westchester Legal Credit Solutions, designated as a Federal Debt Relief Agency by an Act of Congress and the President of the United States, proudly assists consumers seeking relief under the US Bankruptcy Code. Attorney Linda Tirelli is a proud and active member of the NACBA, devoted to the assistance of consumer debtors.

The base fee shall also include the following services to the extent they are requested or reasonably necessary for your effective representation:

- (a) Preparation and filing of proofs of claim on your behalf for your creditors.
- (b) Drafting and filing objections to scheduled and unscheduled proofs of claim.
- (c) Assumptions and rejections of unexpired leases and executory contracts.
- (d) Preparation for and attendance at valuation hearings.
- (e) Motions to transfer venue.
- (f) Requesting copies of proofs of claim from Trustee.
- (g) Consultation with you regarding obtaining post-petition credit (no motion filed).
- (h) Motions to avoid liens.
- (i) Calculation of plan payment modifications (no motion filed).
- (j) Adding creditor address to mailing matrix as necessary.
- (k) Responding to written creditor contacts regarding plan terms, valuation of collateral, claim amounts and the like.
- (l) Responding to your contacts regarding changes in your financial and personal circumstances and advising the Court and Trustee of the same.
- (m) Communicating with you regarding payment defaults, insurance coverage, credit disability and the like.
- (n) Obtaining and providing the Trustee with copies of documents relating to lien perfection issues.
- (o) Notifying creditors of entry of discharge.
- (p) Notifying creditors by certified mail of alleged violations of the automatic stay.
- (q) Drafting and mailing letters regarding voluntary turnover of property.
- (r) Review of documents in relation to the use or sale of collateral (no motion filed).
- (s) Providing you with a list of answers to frequently asked questions and other routine communications with you.

3. Non-Base Attorney Fees.

In some Chapter 13 cases, the legal services which are beyond those contemplated in the base fee must nonetheless be provided by the Attorney. These legal services are also listed below:

- (a) Abandonment of property post-confirmation.
- (b) Motion for moratorium.
- (c) Motion for authority to sell property.
- (d) Motion to modify.
- (e) Motion to use cash collateral or to incur credit.
- (f) Defense of motion for relief from stay or co-debtor stay.
- (g) Defense of motion to dismiss filed after confirmation of your plan.
- (h) Non-base fee requests.
- (i) Stay violation litigation, including amounts paid as fees by the creditor or other party.
- (j) Post-discharge injunction actions.
- (k) Adversary proceedings.
- (l) Wage garnishment orders
- (m) Turnover adversaries.
- (n) Conversion to Chapter 7.
- (o) Motions to substitute collateral.
- (p) Motions For Discharge.
- (q) Any other matter not covered by the base fee.


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For such non-base services, you may be charged without any further notice and in the discretion of the Court non-base fees for the following services and in the amounts noted:

Defense of motion to dismiss the case	\$200.00
Motion to modify order, including moratorium	\$350.00
Motion to substitute collateral	\$450.00
Defense of Motion to lift any stay	\$450.00
Motion to sell real or personal property	\$450.00

The Attorney, in his discretion, may also keep time and expense records for any non-base service and apply to the Court for the approval of the fee plus all expenses incurred. The current hourly fee for your Attorney is \$375.00. All base and non-base fees will be added to your plan (unless paid directly by Debtor or a third-party such as a creditor in a contested case) and will be paid through the plan. It is possible that any non-base fees added to your plan may result in an increase in your monthly plan payment or in an extension of the length of your plan or both.

4. Contingent Fees.

The attorney will be entitled to a contingency fee equal to 50% of any actual recovery from any party for a violation of the automatic stay, the co-debtor stay, the discharge injunction, for breach of the plan or any terms thereof, or for breach of any state or federal consumer protection statutes. The New York Contingency Fee Addendum form is attached to and made a part of this Agreement. 7

5. Expenses.

The Attorney shall be entitled to apply to the Court for approval of any expenses related to your case for base fee or non-base fee services. Such expenses include but are not limited to court fees, telephone fees, fax fees, copy fees, postage fees, PACER fees, electronic or other research fees. In the Court's discretion, the Attorney may request without any notice or documentation a blanket expense of \$1.00 for each item noticed to creditors as an expense for postage, copying and envelopes.

6. Court Approval of Fees.

All fees included in this Agreement are subject to the control of the United States Bankruptcy Court for the Southern District of New York. Any changes in the presumed non-base fees by the Court shall be deemed to immediately modify and amend the terms and conditions of this Agreement as to the non-base fees and shall be incorporated herein by this reference. Any subsequent increase in the base fees by the Court shall have no impact on the original base fee provided for in this Agreement.

7. Assumptions for the Base Fee.

The base fee is based on the following assumptions:

- (a) The Debtor has provided the Attorney with all requested information.
- (b) The Debtor has provided the Attorney with complete and accurate information.
- (c) The Debtor's circumstances, especially the Debtor's current monthly income (as defined by the Bankruptcy Code) does not substantially change prior to the filing of the case.
- (d) The Debtor will provide all requested documents within 15 days of the date of this Agreement.

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8. Costs and Expenses to be paid directly by Debtor.

The debtor shall pay all costs related to the filing of the bankruptcy case. These costs currently include the court filing fee of \$274.00; the costs of mandatory pre-filing credit counseling, which is approximately \$50.00; the mandatory post-filing educational course, which is also approximately \$50.00; the costs of any PACER checks, which is approximately \$10.00; the costs of any appraisals of real or personal property; the costs of obtain current consumer reports in the Debtor is not entitled to free reports; and any other costs as agreed to by the parties.

*pd to take classes
pd 274.00 filing fee*

9. First Payment.

The Debtor must be in a position to make the first full Chapter 13 monthly plan payment at the time the Debtor signs the Chapter 13 court papers. This payment must be made at this time because under local Court Rules the case will be automatically dismissed unless this payment is made within 10 days of the filing of the bankruptcy case. The Debtor must also pay or have paid the \$274.00 filing fee at the time of sign and secured and paid for the consumer credit counseling certificate. ✓

10. Mortgage Payments.

The Debtor acknowledges that the contract mortgage payments on residential real estate cannot be reduced under the Bankruptcy laws but will be paid as follows:

(a) By adding the amount of the payment (plus any back payments), and any future increases as allowed by the mortgage contract, to the Chapter 13 plan payment. As a result, the Debtor will only be responsible for making one single debt payment per month, said payment being the Chapter 13 plan payment; or

(b) By including only the pre-filing arrears or back payments in the plan, with the Debtor being responsible for making all future mortgage payments directly to the mortgage company.

The Debtor has elected to proceed with option: _____

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11. Debtor's Obligations.

The Debtor's obligations are as follows:

- (a) To provide the Attorney with all requested documents, bills statements, payment advices, bank records, tax returns, tax bills, appraisals, retirement and savings account, and income information and to sign any and all necessary forms to allow the Attorney to secure such documentation.
- (b) To provide accurately and honestly all of the information necessary to prepare and file the Chapter 13 bankruptcy case, and other motions or proceedings arising during the course of the case.
- (c) To timely respond to all letters, emails and telephone calls from the Attorney or any member of his staff.
- (d) To keep the Attorney advised at all times of the Debtor's mailing and physical addresses, telephone numbers, and email addresses.

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- (e) To appear at the first meeting of creditors (the 341 meeting) and at any other court hearings or meetings as may be required by the Court or any other party.
- (f) To keep all scheduled office appointments with the Attorney and to notify the Attorney in advance of any problems with the timing and scheduling or rescheduling of such appointments.
- (g) To contact the attorney by Telephone with the understanding that the Attorney is only able to return calls between the hours of 8:00 a.m. to 9:30 a.m. and 4:00 p.m. to 6:00 p.m. If the Attorney is available when the call is actually received, then the call will be taken at that time. However, if you have to leave a message for the Attorney then you must provide a number that you can be reached at during the designated times. The Attorney or Legal Assistant will make every effort to return all such telephone calls within 48 hours, excluding weekends and holidays.
- (h) To provide any information requested of the Debtor by the Chapter 13 Trustee, the Bankruptcy Administrator, or any other party in the case, unless the Court rules that the Debtor is not required to provide such information.
- (i) To respond as soon as possible to any requests for the Debtor by the Attorney or his Legal Assistant.
- (j) To comply with the obligations imposed upon the Debtor by the Local Rules of the Bankruptcy Court for the Southern District of New York, a copy of which is attached to this Agreement.
- (k) To sign a tax authorization form to authorize the Attorney to get copies of income tax returns from the respective taxing agencies for a period of four (4) years prior to the filing of your bankruptcy case.
- (l) To provide current bank account information to include monthly statements as requested and online account balances as of the date of the signing of your bankruptcy petition packet.

12. Attorney Withdrawal from Chapter 13 case, Adversary Proceeding or Contested Matter.

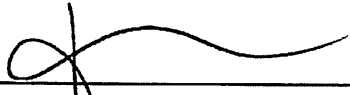
Pursuant to the Local Rules of the Bankruptcy Court, the Attorney shall remain the responsible attorney of record for the Debtor in all matters in the case until the case is closed, dismissed or the discharge is entered or until the Attorney is relieved from such representation by order of the Court. The parties agree that just reasons for the Attorney to withdraw from the representation of the Debtor, include but are not limited to the following:

- (a) The failure of the Debtor to provide complete, truthful and accurate information to the Attorney.
- (b) The failure of the Debtor to comply with the Debtor's obligations as provided for in this Agreement and in the Local Rules.
- (c) The failure of the Debtor to comply with any of the obligations imposed on the Debtor by the Bankruptcy Code and the Bankruptcy Rules.
- (d) The failure or refusal of the Debtor to comply with the Debtor's obligations to provide any supplemental information to the Court or to the Chapter 13 Trustee or to correct any incorrect or incomplete information previously provided to the Court or the Trustee.

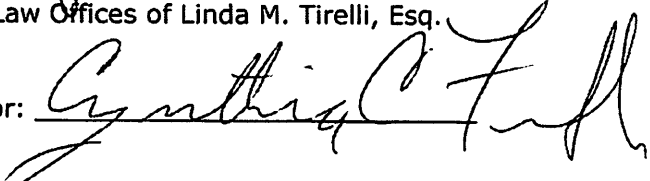

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- (d) The failure of the Debtor to provide complete, truthful and accurate information to the Court, the Chapter 13 Trustee and the Bankruptcy Administrator.
- (e) If the Debtor are husband and wife, then any separation, serious domestic dispute, or divorce of the parties.
- (f) Any irreconcilable conflict between the Attorney and the Debtor with respect to the case.

Dated: 7-16-10

By: 
Law Offices of Linda M. Tirelli, Esq.

Dated: _____

Debtor: 

Dated: _____

Debtor: _____

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Kellett & Bartholow PLLC
 11300 N Central Expy, Ste 301
 Dallas, TX 75243
 United States
 214-696-9000



Cynthia Franklin

Balance \$169,187.01
Invoice # 00423
Invoice Date May 11, 2018
Payment Terms
Due Date

Franklin v. Wells Fargo

Time Entries

Date	EE	Activity	Description	Rate	Hours	Line Total
11/14/2016	CNW	Adversary Proceeding	Review complaint for declaratory judgment filed by L. Tirelli.	350.00	0.4	140.00
11/14/2016	CNW	Adversary Proceeding	Telephone conference with TO3 and L. Tirelli.	350.00	0.3	105.00
12/06/2016	TOB	Adversary Proceeding	Extensive email correspondence with L. Tirelli responding to client questions about representation agreement.	500.00	1.3	650.00
12/07/2016	TOB	Adversary Proceeding	Review WF's answer to original AP complaint.	500.00	0.5	250.00
12/07/2016	TOB	Adversary Proceeding	Telephone conference with T. Twomey regarding strategy for responding to WF's motion to substitute Freddie as creditor on disallowed POC.	500.00	0.6	300.00
12/18/2016	TOB	Adversary Proceeding	Review case history and arguments made by all involved to this point.	500.00	4.5	2,250.00
12/19/2016	CNW	Adversary Proceeding	Conference with TO3 regarding strategy moving forward.	350.00	0.5	175.00
12/19/2016	TOB	Adversary Proceeding	Legal research in preparation for drafting amended complaint regarding 506(d) lien avoidance.	500.00	3.5	1,750.00
12/19/2016	TOB	Adversary Proceeding	Prepare memo to file regarding case history and brainstorming regarding analysis to include in amended complaint.	500.00	2.4	1,200.00
12/19/2016	TOB	Adversary Proceeding	Brainstorming session with CNW regarding causes of action for amended complaint and analysis of relationship between WF and Freddie Mac.	500.00	0.5	250.00
12/19/2016	TOB	Adversary Proceeding	Careful analysis of Judge Drain's 1.29.15 opinion and legal research- review cases cited therein.	500.00	3.5	1,750.00

12/19/2016	TOB	Adversary Proceeding	Email correspondence with L. Tirelli regarding status of fee application and credit reporting issues.	500.00	0.3	150.00
12/19/2016	TOB	Adversary Proceeding	Review credit report excerpts provided by client.	500.00	0.3	150.00
12/19/2016	TOB	Adversary Proceeding	Legal research regarding claim amendment and its effect when the claim is amended to change the name of the creditor.	500.00	2.6	1,300.00
12/20/2016	TOB	Adversary Proceeding	Draft introduction to amended complaint.	500.00	1.6	800.00
12/20/2016	TOB	Adversary Proceeding	Conference with CNW and email correspondence with L. Tirelli regarding "parade of horrors" and setting up conference call.	500.00	0.2	100.00
12/20/2016	TOB	Adversary Proceeding	Telephone conference with L. Tirelli and CNW regarding status of claim objection and next steps for preparation of complaint, examining damages claims, etc.	500.00	1.0	500.00
12/20/2016	TOB	Adversary Proceeding	Conference with CNW regarding causes of action to include in draft complaint.	500.00	0.2	100.00
12/20/2016	TOB	Adversary Proceeding	Study and notate transcript of hearing on first summary judgment motion to identify references to vexatious multiplication of litigation and instances of fraud/misrepresentations by counsel for WF.	500.00	2.3	1,150.00
12/20/2016	TOB	Adversary Proceeding	Review order approving L. Tirelli's fee application received 12/19 and follow up email correspondence with L. Tirelli regarding same.	500.00	0.2	100.00
12/20/2016	CNW	Adversary Proceeding	Telephone conference with TO3 and L. Tirelli regarding amending complaint and strategy moving forward.	350.00	1.0	350.00
12/20/2016	TOB	Adversary Proceeding	Review transcripts from Strassfield case before Judge Drain in hearings involving substantially similar issues with WF, which was represented by N. Schiavo and D. Dunn at Hoyal Lovells US LLP.	500.00	1.4	700.00
12/20/2016	TOB	Adversary Proceeding	Draft amended complaint.	500.00	5.5	2,750.00
12/21/2016	CNW	Adversary Proceeding	Edit amended complaint.	350.00	1.5	525.00
12/22/2016	CNW	Adversary Proceeding	Edit amended complaint.	350.00	3.0	1,050.00
12/26/2016	CNW	Adversary Proceeding	Edit amended complaint.	350.00	5.0	1,750.00
12/27/2016	CNW	Adversary Proceeding	Continue editing amended complaint.	350.00	4.2	1,470.00
12/27/2016	CNW	Adversary Proceeding	Email correspondence with L. Tirelli regarding amended complaint.	350.00	0.3	105.00
12/27/2016	TOB	Adversary Proceeding	Review and edit amended complaint draft.	500.00	1.7	850.00
12/27/2016	TOB	Adversary Proceeding	Telephone conference and email correspondence with L. Tirelli regarding edits to draft of amended complaint.	500.00	0.7	350.00

12/27/2016	TOB	Adversary Proceeding	Telephone conference and email correspondence with CNW regarding revisions of draft complaint.	500.00	0.4	200.00
12/29/2016	CNW	Adversary Proceeding	Prepare Exhibit A to complaint. Email correspondence with TO3 and L. Tirelli regarding same.	350.00	0.2	70.00
12/30/2016	CNW	Adversary Proceeding	Research regarding new case out of Ohio and FCRA invasion of privacy damages.	350.00	0.5	175.00
01/01/2017	TOB	Adversary Proceeding	Email correspondence with L. Tirelli regarding Wells Fargo's request for extension of deadline to answer amended complaint.	500.00	0.2	100.00
01/01/2017	TOB	Adversary Proceeding	Attention to email correspondence from N. Schiavo, counsel for WF, regarding request for 30 day extension of deadline to respond.	500.00	0.1	50.00
01/02/2017	TOB	Adversary Proceeding	Email correspondence with L. Tirelli regarding trip to White Plains on 1/12-1/13.	500.00	0.3	150.00
01/13/2017	TOB	Adversary Proceeding	Meeting with L. Tirelli regarding case status and strategy.	500.00	1.5	750.00
01/20/2017	MA	Adversary Proceeding	Draft notice of appearance for TO3, conference with CNW regarding same.	100.00	0.3	30.00
01/20/2017	CNW	Adversary Proceeding	Attention to notice of appearance for TO3 and conferences with MA regarding same.	350.00	0.3	105.00
01/20/2017	MA	Adversary Proceeding	Prepare COS for notice of appearance, research with CNW into SDNY filing requirements.	100.00	0.5	50.00
01/20/2017	MA	Adversary Proceeding	Finalize, file, and mail TO3 notice of appearance and COS	100.00	0.3	30.00
02/06/2017	TOB	Adversary Proceeding	Review scheduling order and case timelines.	500.00	0.1	50.00
02/10/2017	CNW	Adversary Proceeding	Attention to motion to dismiss filed by defendants.	350.00	0.2	70.00
02/19/2017	TOB	Adversary Proceeding	Review draft response to WF motion to amend POC to substitute Freddie as creditor.	500.00	0.6	300.00
02/20/2017	CNW	Adversary Proceeding	Attention to motion to dismiss filed by WF and deadline to respond. Email correspondence to L. Tirelli regarding same.	350.00	0.3	105.00
02/20/2017	CNW	Adversary Proceeding	Read and review Wells Fargo's motion to dismiss/memorandum of law.	350.00	0.5	175.00
02/21/2017	TOB	Adversary Proceeding	Telephone conference with L. Tirelli regarding preparation for hearing tomorrow on WF motion to amend POC.	500.00	0.7	350.00
02/21/2017	TOB	Adversary Proceeding	Review motion to withdraw the reference and supporting memorandum of law.	500.00	1.0	500.00
02/21/2017	TOB	Adversary Proceeding	Email correspondence with L. Tirelli regarding WF's motion to withdraw the reference.	500.00	0.2	100.00
02/21/2017	CNW	Adversary Proceeding	Attention to motion to withdraw the reference filed by Wells Fargo.	350.00	0.2	70.00
02/22/2017	TOB	Adversary Proceeding	Prepare for hearing on WF/Freddie Mac motion to amend claim.	500.00	2.0	1,000.00

02/22/2017	TOB	Adversary Proceeding	Attend hearing telephonically on WF/ Freddie Mac motion to amend claim.	500.00	0.9	450.00
03/07/2017	TOB	Adversary Proceeding	Research regarding 2nd Circuit standard for withdrawal of the reference.	500.00	0.9	450.00
03/09/2017	TOB	Adversary Proceeding	Continued legal research regarding withdrawal of the reference in 2nd Circuit.	500.00	3.5	1,750.00
03/10/2017	TOB	Adversary Proceeding	Prepare response to motion to withdraw the reference.	500.00	4.5	2,250.00
03/13/2017	TOB	Adversary Proceeding	Edit draft response to motion to withdraw the reference.	500.00	0.7	350.00
03/13/2017	CNW	Adversary Proceeding	Begin editing response to motion to withdraw the reference.	350.00	1.5	525.00
03/14/2017	CNW	Adversary Proceeding	Continue editing response to motion to withdraw the reference.	350.00	4.0	1,400.00
03/14/2017	CNW	Adversary Proceeding	Telephone conference with N. Schiavo regarding briefing schedule for motion to withdraw the reference.	350.00	0.1	35.00
03/14/2017	CNW	Adversary Proceeding	Email correspondence with N. Schiavo regarding briefing schedule for motion to withdraw the reference.	350.00	0.1	35.00
03/15/2017	CNW	Adversary Proceeding	Telephone conference with N. Schiavo regarding briefing schedule for motion to withdraw the reference.	350.00	0.1	35.00
03/16/2017	CNW	Adversary Proceeding	Telephone conference with N. Schiavo regarding briefing schedule.	350.00	0.1	35.00
03/16/2017	CNW	Adversary Proceeding	Telephone conference with N. Schiavo regarding briefing schedule for motion to withdraw the reference.	350.00	0.1	35.00
03/16/2017	CNW	Adversary Proceeding	Review local rules/judge's procedures regarding submission of briefing schedules.	350.00	0.2	70.00
03/17/2017	CNW	Adversary Proceeding	Telephone conference with court coordinator regarding submission of briefing schedule. Correspondence with TO3 regarding same.	350.00	0.2	70.00
03/17/2017	CNW	Adversary Proceeding	Prepare letter to court regarding briefing schedule for motion to withdraw the reference.	350.00	0.4	140.00
03/21/2017	CNW	Adversary Proceeding	Attention to order entered regarding briefing schedule.	350.00	0.2	70.00
03/24/2017	CNW	Adversary Proceeding	Conference with KLK regarding upcoming deadlines and seeking an extension.	350.00	0.2	70.00
03/24/2017	CNW	Adversary Proceeding	Email correspondence with L. Tirelli regarding seeking extension of response deadline to motion to withdraw the reference.	350.00	0.1	35.00
03/25/2017	CNW	Adversary Proceeding	Email correspondence with N. Schiavo regarding extension of motion to withdraw the reference deadlines.	350.00	0.2	70.00
03/27/2017	CNW	Adversary Proceeding	Telephone conference with N. Schiavo regarding extension for response to motion to withdraw the reference.	350.00	0.2	70.00

03/27/2017	CNW	Adversary Proceeding	Email and telephone correspondence with L. Tirelli and TO3 regarding one-day extension to file response.	350.00	0.3	105.00
03/27/2017	CNW	Adversary Proceeding	Review local rules regarding requests for extensions.	350.00	0.2	70.00
03/27/2017	CNW	Adversary Proceeding	Prepare letter to chambers requesting extension of response deadline for motion to withdraw the reference.	350.00	0.3	105.00
03/27/2017	CNW	Adversary Proceeding	Finalize and submit letter to Court regarding request for extension.	350.00	0.2	70.00
03/28/2017	CNW	Adversary Proceeding	Attention to docket to see if order entered granting extension.	350.00	0.2	70.00
03/29/2017	CNW	Adversary Proceeding	Continue working on response to motion to withdraw the reference.	350.00	0.4	140.00
03/29/2017	CNW	Adversary Proceeding	Review TO3 outline for brief and review case law on motion to withdraw the reference.	350.00	1.5	525.00
03/30/2017	CNW	Adversary Proceeding	Conference with TO3 regarding response brief to motion to withdraw the reference.	350.00	0.3	105.00
03/30/2017	CNW	Adversary Proceeding	Review Executive Benefits case for response to motion to withdraw the reference.	350.00	0.5	175.00
03/30/2017	CNW	Adversary Proceeding	Work on response to motion to withdraw the reference.	350.00	4.7	1,645.00
03/31/2017	CNW	Adversary Proceeding	Continue work on response to motion to withdraw the reference.	350.00	7.8	2,730.00
04/12/2017	CNW	Adversary Proceeding	Attention to motion to dismiss hearing date and deadline to file response.	350.00	0.2	70.00
04/12/2017	TOB	Adversary Proceeding	Email correspondence with L. Tirelli regarding scheduling confirmation and motion to dismiss hearings.	500.00	0.2	100.00
04/13/2017	TOB	Adversary Proceeding	Email correspondence with L. Tirelli regarding upcoming confirmation and motion to dismiss hearings.	500.00	0.1	50.00
04/14/2017	CNW	Adversary Proceeding	Email correspondence with N. Schiavo regarding request for sur-reply due to new arguments raised in reply.	350.00	0.2	70.00
04/14/2017	CNW	Adversary Proceeding	Review reply regarding motion to withdraw the reference.	350.00	0.2	70.00
04/19/2017	TOB	Adversary Proceeding	Attention to deadlines for filing sur-reply and need to file motion to authorize sur-reply and sur-sur-reply.	500.00	0.2	100.00
04/19/2017	CNW	Adversary Proceeding	Prepare motion to file sur-reply and proposed order.	350.00	0.6	210.00
04/19/2017	CNW	Adversary Proceeding	Email correspondence with N. Schiavo regarding motion to file sur-reply.	350.00	0.1	35.00
04/21/2017	CNW	Adversary Proceeding	Finalize and file motion for leave to file sur-reply.	350.00	0.4	140.00
04/26/2017	CNW	Adversary Proceeding	Review docket sheet to check status of motion for leave.	350.00	0.1	35.00

04/28/2017	CNW	Adversary Proceeding	Edit, finalize, and file sur-reply to motion to withdraw the reference.	350.00	1.0	350.00
05/01/2017	TOB	Adversary Proceeding	Telephone conference with L. Tirelli regarding scheduling of confirmation hearing and pre-trial conference.	500.00	0.3	150.00
05/01/2017	TOB	Adversary Proceeding	Conference call with L. Tirelli and N. Schiavo regarding scheduling issues in the case and upcoming hearing on confirmation/pre-trial conference.	500.00	0.4	200.00
05/01/2017	TOB	Adversary Proceeding	Work on response to motion to dismiss: Legal research regarding viability of 105(a) claim in 2nd Circuit, including review of cases cited by Wells Fargo in its motion to dismiss.	500.00	1.5	750.00
05/01/2017	CNW	Adversary Proceeding	Conference with TO3 regarding response to motion to dismiss.	350.00	0.2	70.00
05/01/2017	CNW	Adversary Proceeding	Research for response to motion to dismiss relating to fraud and negligence causes of actions.	350.00	1.0	350.00
05/02/2017	CNW	Adversary Proceeding	Research for response to motion to dismiss relating to fraud claim.	350.00	1.5	525.00
05/02/2017	CNW	Adversary Proceeding	Research relating to negligence cause of action for motion to dismiss response.	350.00	1.8	630.00
05/02/2017	CNW	Adversary Proceeding	Telephone conference with TO3 and L. Tirelli regarding status quo of proof of claim and procedural issues.	350.00	0.4	140.00
05/02/2017	CNW	Adversary Proceeding	Conferences with TO3 regarding fraud and negligence claims.	350.00	0.4	140.00
05/02/2017	CNW	Adversary Proceeding	Continued research in preparation for motion to dismiss response.	350.00	2.0	700.00
05/02/2017	TOB	Adversary Proceeding	Evaluate motion to dismiss filed by WF in light of tomorrow's pretrial conference hearing and hearing on confirmation.	500.00	1.0	500.00
05/02/2017	TOB	Adversary Proceeding	Telephone conference with L. Tirelli and CNW regarding tomorrow's case management conference and confirmation hearing; discuss concerns regarding status of claim / claim objection.	500.00	0.5	250.00
05/02/2017	TOB	Adversary Proceeding	Detailed email correspondence to L. Tirelli based on evaluation of case history and docket, regarding presenting issue of status of disallowed claim at the case management conference in order to determine whether the motion to dismiss is ripe / whether it is necessary to object to already-disallowed proof of claim.	500.00	1.2	600.00
05/03/2017	CNW	Adversary Proceeding	Begin preparing response to motion to dismiss.	350.00	0.3	105.00
05/03/2017	CNW	Adversary Proceeding	Conference with TO3 regarding result from hearing this morning.	350.00	0.2	70.00
05/03/2017	TOB	Adversary Proceeding	Telephone conference with L. Tirelli in preparation for case management hearing / confirmation hearing.	500.00	0.4	200.00

05/03/2017	TOB	Adversary Proceeding	Prepare for and attend telephonic case management / confirmation hearing.	500.00	1.2	600.00
05/03/2017	TOB	Adversary Proceeding	Telephone conference with L. Tirelli regarding result of case management/confirmation hearing.	500.00	0.2	100.00
05/11/2017	CNW	Adversary Proceeding	Attention to rescheduled hearing on motion to dismiss, including correspondence to BDG and TO3 regarding same.	350.00	0.2	70.00
05/18/2017	TOB	Adversary Proceeding	Work on response to motion to dismiss - outline and organization.	500.00	1.0	500.00
05/23/2017	CNW	Adversary Proceeding	Review motion to dismiss and begin work on response.	350.00	2.0	700.00
05/24/2017	CNW	Adversary Proceeding	Conference with TO3 regarding response to motion to dismiss and legal theories.	350.00	0.4	140.00
05/24/2017	CNW	Adversary Proceeding	Work on response to motion to dismiss.	350.00	5.0	1,750.00
05/25/2017	CNW	Adversary Proceeding	Work on response to motion to dismiss.	350.00	11.0	3,850.00
05/26/2017	CNW	Adversary Proceeding	Work on motion to dismiss.	350.00	10.5	3,675.00
06/02/2017	CNW	Adversary Proceeding	Edit response to motion to dismiss to correct table of authorities.	350.00	0.5	175.00
06/02/2017	CNW	Adversary Proceeding	Finalize and file amended response to motion to dismiss.	350.00	0.2	70.00
06/02/2017	CNW	Adversary Proceeding	Assist TO3 in preparing for hearing on motion to dismiss.	350.00	3.5	1,225.00
06/02/2017	CNW	Adversary Proceeding	Attention to reply memorandum filed by Wells Fargo.	350.00	0.3	105.00
06/04/2017	TOB	Adversary Proceeding	Review amended complaint, caselaw, and briefs to prepare for argument on WF motion to dismiss.	500.00	4.5	2,250.00
06/04/2017	TOB	Adversary Proceeding	Travel to White Plains for argument on WF motion to dismiss.	250.00	6.0	1,500.00
06/05/2017	TOB	Adversary Proceeding	Prepare for, attend, and argue hearing on Wells Fargo's motion to dismiss.	500.00	6.5	3,250.00
06/05/2017	TOB	Adversary Proceeding	Return travel from White Plains to Dallas following argument on Wells Fargo motion to dismiss - flight was 2 hours delayed.	250.00	8.0	2,000.00
06/21/2017	CNW	Adversary Proceeding	Telephone conference with TO3, L. Tirelli, and N. Schaivo regarding scheduling.	350.00	0.4	140.00
06/26/2017	CNW	Adversary Proceeding	Attention to draft order on motion to dismiss. Email correspondence with TO3 regarding same.	350.00	0.3	105.00
07/05/2017	TOB	Adversary Proceeding	Telephone conference with CNW and client to discuss damages related to negligent credit pull.	500.00	0.8	400.00
07/05/2017	TOB	Adversary Proceeding	Draft credit pull damages allegations for amendment to complaint.	500.00	1.0	500.00
07/05/2017	TOB	Adversary Proceeding	Review Lopez motion for leave to amend, reply in support, and Judge Isgur's opinion authorizing amendment in connection with preparation of motion for leave to amend.	500.00	1.2	600.00

07/05/2017	TOB	Adversary Proceeding	Legal research regarding pleading standards for allegation of negligent unauthorized credit pull.	500.00	0.6	300.00
07/05/2017	TOB	Adversary Proceeding	Telephone conference with L. Tirelli regarding amendments to complaint and Judge Drain's order on the motion to dismiss.	500.00	0.3	150.00
07/05/2017	TOB	Adversary Proceeding	Review order on motion to dismiss (granting in part and denying in part) and evaluate merits of amendment of complaint vs. filing supplemental claim objection.	500.00	0.5	250.00
07/05/2017	TOB	Adversary Proceeding	Edit draft motion for leave to amend.	500.00	0.8	400.00
07/05/2017	TOB	Adversary Proceeding	Instruct CNW regarding additional allegations to make in proposed amended complaint regarding relation back of fraud and negligence allegations to the date of filing of the claim objection.	500.00	0.2	100.00
07/05/2017	TOB	Adversary Proceeding	Preparation for client conference call.	500.00	0.6	300.00
07/05/2017	TOB	Adversary Proceeding	Email correspondence with L. Tirelli regarding setting hearing on motion to amend.	500.00	0.2	100.00
07/05/2017	TOB	Adversary Proceeding	Further edits to draft motion for leave to amend complaint.	500.00	0.7	350.00
07/05/2017	TOB	Adversary Proceeding	Final review of motion to amend and amended complaint prior to filing.	500.00	0.6	300.00
07/05/2017	CNW	Adversary Proceeding	Prepare second amended complaint.	350.00	0.8	280.00
07/05/2017	CNW	Adversary Proceeding	Prepare motion for leave to amend complaint.	350.00	3.0	1,050.00
07/05/2017	CNW	Adversary Proceeding	Finalize and file motion for leave to amend, attaching second amended complaint.	350.00	0.4	140.00
07/06/2017	CNW	Adversary Proceeding	Attention to scheduling order. Conference with TGC regarding same.	350.00	0.4	140.00
07/24/2017	TOB	Adversary Proceeding	Review correspondence received from Wells Fargo via mail over the weekend, including interrogatories, requests for production, and deposition notice (scheduling deposition for same date as hearing on motion to amend complaint).	500.00	0.5	250.00
07/24/2017	TOB	Adversary Proceeding	Email correspondence with trial team regarding scheduling deposition of Ms. Franklin for end-of-August/early September.	500.00	0.4	200.00
07/24/2017	CNW	Adversary Proceeding	Email correspondence with N. Schiavo regarding deposition date conflict.	350.00	0.2	70.00
07/24/2017	CNW	Adversary Proceeding	Receive and review discovery requests and deposition notices from WF. Email correspondence with L. Tirelli regarding same.	350.00	0.3	105.00
07/29/2017	TOB	Adversary Proceeding	Telephone conference with L. Tirelli regarding our discovery strategy in terms of what needs to be obtained from Wells Fargo.	500.00	0.7	350.00
08/16/2017	CNW	Adversary Proceeding	Email correspondence with client regarding need to discuss discovery responses.	350.00	0.1	35.00

08/16/2017	CNW	Adversary Proceeding	Begin preparing discovery responses.	350.00	1.5	525.00
08/17/2017	CNW	Adversary Proceeding	Telephone conference with client regarding discovery responses.	350.00	0.5	175.00
08/17/2017	CNW	Adversary Proceeding	Email correspondence with client regarding discovery responses.	350.00	0.2	70.00
08/21/2017	CNW	Adversary Proceeding	Email correspondence with N. Schiavo regarding discovery extension.	350.00	0.1	35.00
08/21/2017	CNW	Adversary Proceeding	Telephone conferences with client regarding discovery responses.	350.00	1.0	350.00
08/21/2017	CNW	Adversary Proceeding	Continue preparing discovery responses.	350.00	2.5	875.00
08/22/2017	CNW	Adversary Proceeding	Multiple telephone conferences with client regarding discovery responses.	350.00	3.5	1,225.00
08/22/2017	CNW	Adversary Proceeding	Continue work on discovery responses and identifying documents for production.	350.00	4.0	1,400.00
08/23/2017	CNW	Adversary Proceeding	Email correspondence with L. Tirelli regarding discovery.	350.00	0.1	35.00
08/23/2017	CNW	Adversary Proceeding	Email correspondence with N. Schiavo regarding deposition scheduling and discovery.	350.00	0.1	35.00
08/23/2017	CNW	Adversary Proceeding	Attention to medical record subpoenas served by Wells Fargo.	350.00	0.1	35.00
08/28/2017	CNW	Adversary Proceeding	Email correspondence with N. Schiavo and client regarding rescheduling depositions.	350.00	0.2	70.00
08/31/2017	CNW	Adversary Proceeding	Review letter from N. Schiavo regarding discovery.	350.00	0.2	70.00
08/31/2017	TOB	Adversary Proceeding	Review correspondence received from N. Schiavo regarding alleged deficiencies in our discovery responses to Wells Fargo.	500.00	0.5	250.00
08/31/2017	TOB	Adversary Proceeding	Email correspondence with L. Tirelli regarding Wells Fargo's letter regarding alleged discovery deficiencies.	500.00	0.4	200.00
09/07/2017	CNW	Adversary Proceeding	Review WF's discovery deficiency letter. Email correspondence with N. Schiavo regarding same.	350.00	0.3	105.00
09/11/2017	TOB	Adversary Proceeding	Preparation for deposition of C. Franklin.	500.00	2.2	1,100.00
09/12/2017	CNW	Adversary Proceeding	Attention to subpoena for Paul Riss.	350.00	0.1	35.00
09/12/2017	CNW	Adversary Proceeding	Conferences with TO3 regarding discovery status and need for agreed order.	350.00	0.2	70.00
09/12/2017	CNW	Adversary Proceeding	Prepare proposed order on motion to amend.	350.00	0.2	70.00
09/12/2017	CNW	Adversary Proceeding	Conference with TO3 regarding deposition of client.	350.00	0.1	35.00
09/13/2017	RD	Adversary Proceeding	Prepare Rule 26(a)(1) initial disclosures.	100.00	1.2	120.00
09/13/2017	TOB	Adversary Proceeding	Preparation for deposition of C. Franklin.	500.00	6.5	3,250.00

09/13/2017	TOB	Adversary Proceeding	Travel to NY for deposition of C. Franklin.	250.00	5.0	1,250.00
09/14/2017	CNW	Adversary Proceeding	Email correspondence with L. Tirelli regarding proposed order on motion to amend.	350.00	0.1	35.00
09/14/2017	CNW	Adversary Proceeding	Attention to additional documents for production. Email correspondence with TO3 and L. Tirelli regarding same.	350.00	0.3	105.00
09/14/2017	RD	Adversary Proceeding	Continue preparing Rule 26 disclosures.	100.00	1.5	150.00
09/14/2017	RD	Adversary Proceeding	Prepare discovery requests to Wells Fargo	100.00	1.3	130.00
09/14/2017	CNW	Adversary Proceeding	Instruct RLD regarding preparation of discovery requests.	350.00	0.1	35.00
09/14/2017	TOB	Adversary Proceeding	Prepare for and attend deposition of C. Franklin.	500.00	7.5	3,750.00
09/14/2017	TOB	Adversary Proceeding	Return travel from deposition of C. Franklin in White Plains, NY.	250.00	5.0	1,250.00
09/15/2017	RD	Adversary Proceeding	Prepare discovery requests to Wells Fargo.	100.00	1.3	130.00
09/15/2017	TOB	Adversary Proceeding	Edit discovery requests to Wells Fargo.	500.00	5.5	2,750.00
09/15/2017	CNW	Adversary Proceeding	Conferences with RD regarding discovery requests.	350.00	0.4	140.00
09/18/2017	RD	Adversary Proceeding	Edit discovery requests to Wells Fargo,	100.00	2.2	220.00
09/18/2017	CNW	Adversary Proceeding	Conference with RD regarding discovery requests.	350.00	0.4	140.00
09/20/2017	CNW	Adversary Proceeding	Edit Rule 26 disclosures, including detailed review of documents filed in bankruptcy.	350.00	1.5	525.00
09/20/2017	TOB	Adversary Proceeding	Email correspondence with D. Dunn and N. Schiavo regarding Rule 26(f) conference.	500.00	0.2	100.00
09/25/2017	CNW	Adversary Proceeding	Finalize and file second amended complaint.	350.00	0.2	70.00
09/25/2017	TOB	Adversary Proceeding	Attention to efforts to reschedule deposition of P. Riss, including email correspondence with N. Schiavo, C. Franklin, and P. Riss, telephone conference with P. Riss regarding same.	500.00	0.5	250.00
09/26/2017	CNW	Adversary Proceeding	Finalize Rule 26 disclosures.	350.00	0.2	70.00
09/26/2017	CNW	Adversary Proceeding	Conference with TO3 regarding discovery requests.	350.00	0.5	175.00
09/26/2017	CNW	Adversary Proceeding	Prepare 30(b)(6) deposition notice for Wells Fargo.	350.00	0.4	140.00
09/26/2017	CNW	Adversary Proceeding	Prepare 30(b)(6) deposition notice for Freddie Mac.	350.00	0.3	105.00
09/26/2017	TOB	Adversary Proceeding	Telephone conference with L. Tirelli regarding strategy for drafting discovery requests to defendants.	500.00	0.4	200.00

09/26/2017	TOB	Adversary Proceeding	Extensive revisions to draft discovery requests.	500.00	2.4	1,200.00
09/26/2017	TOB	Adversary Proceeding	Conference with CNW regarding 30(b)(6) deposition notices to Wells Fargo and Freddie Mac.	500.00	0.5	250.00
09/26/2017	TOB	Adversary Proceeding	Revise draft Rule 30(b)(6) deposition notices to Wells Fargo and Freddie Mac.	500.00	0.5	250.00
09/26/2017	CNW	Adversary Proceeding	Edit Plaintiff's first requests for discovery.	350.00	2.5	875.00
09/26/2017	CNW	Adversary Proceeding	Prepare ESI letter.	350.00	0.2	70.00
09/26/2017	CNW	Adversary Proceeding	Edit deposition notices.	350.00	0.3	105.00
10/03/2017	TOB	Adversary Proceeding	Email correspondence with N. Schiavo regarding agreement to mediate and need to abate deadlines and schedule conference with Judge Drain regarding same.	500.00	0.5	250.00
10/03/2017	TOB	Adversary Proceeding	Telephone conference with L. Tirelli regarding upcoming Rule 26(f) conference and Wells Fargo's proposal to mediate the case and to abate discovery pending the results of the mediation.	500.00	0.6	300.00
10/05/2017	CNW	Adversary Proceeding	Attend Rule 26 conference with TO3, L. Tirelli, and N. Schiavo.	350.00	0.5	175.00
10/05/2017	TOB	Adversary Proceeding	Telephone conference with L. Tirelli and N. Schiavo regarding Rule 26 conference and scheduling issues.	500.00	0.5	250.00
10/10/2017	MP	Adversary Proceeding	Prepare spreadsheet comparing Defendants' Answer to Amended Complaint.	100.00	1.5	150.00
10/16/2017	TOB	Adversary Proceeding	Revise proposed stipulation abating deadlines to give the parties an opportunity for mediation.	500.00	0.8	400.00
10/16/2017	TOB	Adversary Proceeding	Review and revise draft report to Court (prepared by L. Tirelli) regarding scheduling matters and case status.	500.00	0.6	300.00
10/18/2017	TOB	Adversary Proceeding	Email correspondence with L. Tirelli regarding proposed scheduling order.	500.00	0.2	100.00
10/18/2017	TOB	Adversary Proceeding	Revise proposed agreed scheduling order and convey to opposing counsel via email.	500.00	0.6	300.00
10/19/2017	TOB	Adversary Proceeding	Telephone conference with potential mediator S. Baum regarding details of the case.	500.00	1.2	600.00
10/19/2017	TOB	Adversary Proceeding	Email correspondence with OC regarding mediation and scheduling issues.	500.00	0.3	150.00
10/23/2017	TOB	Adversary Proceeding	Email correspondence with D.Dunn and N. Schiavo regarding scheduling conference call to discuss mediation timing and mediator selection.	500.00	0.3	150.00
11/07/2017	TOB	Adversary Proceeding	Telephone conference with R. Dietz and D. Dunn regarding mediation preparation and schedule for submission of information to mediator.	500.00	1.0	500.00
11/13/2017	CNW	Adversary Proceeding	Edit proposed stipulation regarding abatement of deadlines.	350.00	0.3	105.00

11/14/2017	CNW	Adversary Proceeding	Finalize and file stipulation.	350.00	0.4	140.00
11/24/2017	TOB	Adversary Proceeding	Preparation for mediation, including identification of materials to provide to mediator, read and mark up transcripts from motion to dismiss hearing, motion for summary judgment hearing, discovery hearing.	500.00	5.5	2,750.00
11/26/2017	TOB	Adversary Proceeding	Preparation for mediation - identify materials to provide to mediator.	500.00	2.5	1,250.00
11/28/2017	CNW	Adversary Proceeding	Conference with TO3 regarding mediation preparation.	350.00	0.2	70.00
11/29/2017	CNW	Adversary Proceeding	Research causes of action in complaint to prepare mediation statement.	350.00	1.5	525.00
11/29/2017	CNW	Adversary Proceeding	Work on mediation statement.	350.00	0.8	280.00
11/30/2017	CNW	Adversary Proceeding	Conference with TO3 regarding mediation statement.	350.00	0.5	175.00
11/30/2017	CNW	Adversary Proceeding	Work on mediation statement.	350.00	3.5	1,225.00
12/01/2017	RD	Adversary Proceeding	Review Cotton preliminary injunction and complaint for WF Sanctions for Mediation Statement.	100.00	2.0	200.00
12/01/2017	TOB	Adversary Proceeding	Legal research regarding FCRA damages for mediation statement.	500.00	2.2	1,100.00
12/01/2017	TOB	Adversary Proceeding	Draft summary of fraud/negligence/sanctions claims section of mediation statement.	500.00	1.8	900.00
12/01/2017	TOB	Adversary Proceeding	Research regarding punitive damages in 2nd Cir. and regarding punitive damages awards that require payment of funds to legal services entities - especially including docket history of Sundquist and Charity cases.	500.00	2.0	1,000.00
12/01/2017	TOB	Adversary Proceeding	Revise, edit mediation statement and conferences with CNW regarding same.	500.00	1.5	750.00
12/01/2017	CNW	Adversary Proceeding	Work on mediation statement.	350.00	10.0	3,500.00
12/04/2017	CNW	Adversary Proceeding	Telephone conference with L. Tirelli regarding mediation strategy.	350.00	0.2	70.00
12/04/2017	CNW	Adversary Proceeding	Review Defendants' mediation statement.	350.00	0.4	140.00
12/04/2017	CNW	Adversary Proceeding	Conference with TO3 regarding mediation strategy.	350.00	0.2	70.00
12/04/2017	CNW	Adversary Proceeding	Telephone conference with TO3, L. Tirelli, and mediator regarding our position for mediation.	350.00	1.0	350.00
12/04/2017	CNW	Adversary Proceeding	Email correspondence with mediator regarding cases supporting our position.	350.00	0.2	70.00
12/04/2017	TOB	Adversary Proceeding	Telephone conference with L. Tirelli and CNW regarding mediation.	500.00	0.5	250.00
12/04/2017	TOB	Adversary Proceeding	Telephone conference with R. Deitz, CNW, and L. Tirelli regarding mediation.	500.00	1.0	500.00

12/04/2017	TOB	Adversary Proceeding	Review and mark-up transcript of hearing on claim objection.	500.00	2.2	1,100.00
12/04/2017	TOB	Adversary Proceeding	Email correspondence with C. Franklin regarding damages and mediation.	500.00	0.4	200.00
12/05/2017	CNW	Adversary Proceeding	Research relating to response to WF's mediation statement.	350.00	3.7	1,295.00
12/05/2017	CNW	Adversary Proceeding	Work on response to WF's mediation statement.	350.00	1.7	595.00
12/05/2017	TOB	Adversary Proceeding	Telephone conference with L. Tirelli regarding mediation strategy and scheduling meeting with C. Franklin.	500.00	0.3	150.00
12/05/2017	CNW	Adversary Proceeding	Conference with TO3 regarding mediation statement response.	350.00	0.3	105.00
12/06/2017	CNW	Adversary Proceeding	Further research regarding unjust enrichment damages.	350.00	0.3	105.00
12/07/2017	CNW	Adversary Proceeding	Conference with TO3 regarding mediation statement.	350.00	0.6	210.00
12/07/2017	CNW	Adversary Proceeding	Telephone conference with L. Tirelli, TO3, and client regarding mediation.	350.00	1.0	350.00
12/07/2017	CNW	Adversary Proceeding	Work on mediation statement.	350.00	2.0	700.00
12/08/2017	CNW	Adversary Proceeding	Continue work on mediation statement.	350.00	2.5	875.00
12/08/2017	CNW	Adversary Proceeding	Finalize mediation response and exhibits.	350.00	0.9	315.00
12/08/2017	CNW	Adversary Proceeding	Telephone conference with TO3, C. Franklin, L. Tirelli, and R. Deitz regarding mediation.	350.00	1.2	420.00
12/11/2017	CNW	Adversary Proceeding	Conference with RD regarding preparation of time records for mediation.	350.00	0.1	35.00
12/11/2017	CNW	Adversary Proceeding	Email correspondence with N. Schiavo, D. Dunn, and L. Tirelli regarding TO3's availability for call with court.	350.00	0.1	35.00
12/11/2017	CNW	Adversary Proceeding	Conference with RD regarding preparations for mediation.	350.00	0.1	35.00
12/12/2017	CNW	Adversary Proceeding	Instruct RD regarding materials needed for TO3 at mediation this week.	350.00	0.2	70.00
12/13/2017	CNW	Adversary Proceeding	Attention to cases necessary for mediation.	350.00	0.2	70.00
12/13/2017	TOB	Adversary Proceeding	Prepare for mediation by reviewing documents, case history, billing records, mediation statements, etc.	500.00	6.0	3,000.00
12/14/2017	CNW	Adversary Proceeding	Conference with RD regarding materials for mediation.	350.00	0.1	35.00
12/14/2017	TOB	Travel	Travel to NYC for mediation.	250.00	6.0	1,500.00
12/14/2017	TOB	Adversary Proceeding	Prepare for mediation, including evaluation of settlement strategy and client management.	500.00	2.5	1,250.00
12/15/2017	CNW	Adversary Proceeding	Email correspondence with TO3 regarding materials for mediation.	350.00	0.1	35.00

12/15/2017	TOB	Adversary Proceeding	Prepare for and attend mediation.	500.00	12.0	6,000.00
12/16/2017	TOB	Travel	Return from NYC to DFW following mediation.	250.00	5.0	1,250.00
12/18/2017	TOB	Adversary Proceeding	Telephone conference with R. Deitz regarding mediation aftermath and strategy going forward.	500.00	1.1	550.00
01/03/2018	TOB	Adversary Proceeding	Email correspondence with L. Tirelli regarding draft objection to amended claim and follow-up correspondence with mediator.	500.00	0.2	100.00
01/03/2018	TOB	Claim Objection	Review and comment on draft claim objection received from L. Tirelli. Determine that it requires substantial revision and prepare outline for modified form of claim objection.	500.00	0.7	350.00
01/04/2018	TOB	Claim Objection	Review Rule 3001(c)(2)(D) and instruct CNW regarding preparation of claim objection and Rule 3001 motion to prevent WF from using additional supporting documentation.	500.00	0.5	250.00
01/04/2018	CNW	Claim Objection	Prepare objection to claim.	350.00	0.6	210.00
01/04/2018	CNW	Claim Objection	Conference with TO3 regarding objection to claim and motion for attorneys' fees.	350.00	0.1	35.00
01/04/2018	TOB	Claim Objection	Conference with CNW regarding Wells Fargo's non-compliance with Rule 3001 beyond simply failing to attach documentation.	500.00	0.1	50.00
01/04/2018	CNW	Claim Objection	Review proof of claim, prior claim objection, and prior proofs of claim.	350.00	0.5	175.00
01/04/2018	CNW	Claim Objection	Research relating to Fed. R. Bankr. P. 3001 and required documents for proof of claim.	350.00	0.5	175.00
01/04/2018	CNW	Claim Objection	Prepare motion for sanctions pursuant to FRBP 3001.	350.00	1.1	385.00
01/04/2018	TOB	Claim Objection	Edit draft claim objection and motion for 3001(c)(2)(D) relief.	500.00	1.0	500.00
01/05/2018	TOB	Claim Objection	Continue to work on editing draft claim objection and motion for Rule 3001 sanctions.	500.00	0.6	300.00
01/05/2018	CNW	Claim Objection	Edit motion for sanctions pursuant to FRBP 3001.	350.00	0.3	105.00
01/05/2018	CNW	Claim Objection	Finalize claim objection and motion for sanctions. Email correspondence with L. Tirelli regarding same.	350.00	0.3	105.00
01/10/2018	TOB	Claim Objection	Email correspondence with L. Tirelli regarding draft objection to claim and motion for 3001 relief.	500.00	0.2	100.00
01/10/2018	TOB	Adversary Proceeding	Email correspondence with R. Deitz regarding settlement / mediator's proposal.	500.00	0.2	100.00
01/12/2018	TOB	Adversary Proceeding	Email correspondence with L. Tirelli and R. Deitz regarding mediator's proposal / conference regarding same.	500.00	0.2	100.00
01/12/2018	TOB	Claim Objection	Email correspondence and telephone conference with L. Tirelli regarding proposed objection and motion for 3001 sanctions.	500.00	0.2	100.00
01/12/2018	TOB	Adversary Proceeding	Telephone conference with L. Tirelli and R. Dietz to discuss possible strategies for resolution of case.	500.00	0.5	250.00

01/15/2018	TOB	Adversary Proceeding	Telephone conference with R. Dietz regarding mediation status and settlement process.	500.00	0.5	250.00
01/17/2018	TOB	Adversary Proceeding	Email correspondence with L. Tirelli regarding motion to withdraw reference, whether to agree to delay in district court proceedings while mediation process plays out.	500.00	0.3	150.00
01/17/2018	TOB	Adversary Proceeding	Attention to letter to district court from N. Schiavo regarding our filing of claim objection and motion for sanctions, requesting extension of stand still.	500.00	0.3	150.00
01/17/2018	TOB	Adversary Proceeding	Telephone conference with L. Tirelli regarding strategy for responding to email correspondence from D. Dunn.	500.00	0.4	200.00
01/17/2018	TOB	Adversary Proceeding	Email correspondence from OC regarding status of stay of district court action as it relates to our filing of claim objection and motion for sanctions.	500.00	0.2	100.00
01/18/2018	TOB	Adversary Proceeding	Telephone conference with R. Dietz regarding mediation / settlement / claim objection and sanctions motion / scheduling telephone conference with N. Schiavo.	500.00	0.5	250.00
01/18/2018	TOB	Adversary Proceeding	Email correspondence with R. Dietz and N. Schiavo regarding conference call tomorrow at 11am.	500.00	0.1	50.00
01/19/2018	TOB	Adversary Proceeding	Study most recent Sundquist opinion declining to withdraw previous opinion awarding substantial punitive damages against BOA in mortgage stay violation / abuse of process litigation (1.0) and forward opinion to R. Dietz in advance of our call this afternoon, with explanation of its relevance (.2).	500.00	1.2	600.00
01/19/2018	TOB	Adversary Proceeding	Telephone conference with R. Dietz and N. Schiavo regarding settlement and case posture.	500.00	2.3	1,150.00
01/19/2018	TOB	Adversary Proceeding	Research regarding tax issues related to settlement resulting in cancellation of indebtedness regarding mortgage.	500.00	1.1	550.00
01/19/2018	TOB	Adversary Proceeding	Telephone conference with L. Tirelli regarding settlement strategy, follow up after call with R. Dietz and N. Schiavo.	500.00	0.4	200.00
01/26/2018	TOB	Adversary Proceeding	Research regarding availability of attorneys' fees under 105(a) in NYSB in response to request from mediator.	500.00	2.2	1,100.00
01/29/2018	TOB	Adversary Proceeding	Telephone conference with R. Dietz regarding mediator's proposal, tax issues, sanctions, and next steps.	500.00	0.9	450.00
01/29/2018	TOB	Adversary Proceeding	Research regarding tax implications of payment of settlement including attorneys' fees under new tax law.	500.00	2.2	1,100.00
02/02/2018	TOB	Adversary Proceeding	Email correspondence with R. Deitz regarding mediator's proposal.	500.00	0.2	100.00
02/12/2018	TOB	Adversary Proceeding	Telephone conference with R. Dietz regarding mediation and settlement strategy.	500.00	0.3	150.00

02/21/2018	TOB	Adversary Proceeding	Telephone conference with R. Deitz regarding settlement.	500.00	0.3	150.00
02/22/2018	TOB	Adversary Proceeding	Telephone conference with R. Deitz regarding numbers and other information he needs from us to determine what to include in his mediator's proposal.	500.00	0.5	250.00
02/22/2018	TOB	Adversary Proceeding	Review docket sheet, claims, and Ch13 plan from base bankruptcy case to determine how much the Ch13 Trustee is holding in Ms. Franklin's case, in connection with settlement/mediation efforts.	500.00	0.5	250.00
02/22/2018	TOB	Adversary Proceeding	Correspondence with L. Tirelli regarding her fees in the AP, amounts the Trustee is holding, mediation status, and what non-mortgage claims need to be paid in the BK.	500.00	0.5	250.00
02/23/2018	TOB	Adversary Proceeding	Telephone call with L. Tirelli regarding mediation status, mediator's efforts to come up with a reasonable proposal, and what we would recommend to client to settle the case.	500.00	0.4	200.00
02/23/2018	TOB	Adversary Proceeding	Email correspondence with N. Schiavo and R. Deitz regarding conference about mediator's proposal/settlement options.	500.00	0.2	100.00
02/23/2018	TOB	Adversary Proceeding	Follow-up telephone conference with R. Deitz regarding mediator's proposal.	500.00	0.4	200.00
02/24/2018	TOB	Adversary Proceeding	Conferences with mediator and L. Tirelli and N. Schiavo regarding settlement possibilities.	500.00	1.3	650.00
02/24/2018	TOB	Adversary Proceeding	Edit language in draft mediator's proposal (.4) and email correspondence with mediator regarding same (.1).	500.00	0.5	250.00
02/25/2018	TOB	Adversary Proceeding	Telephone conference with mediator and L. Tirelli regarding settlement/mediator's proposal.	500.00	0.5	250.00
03/01/2018	TOB	Adversary Proceeding	Email and telephone correspondence with mediator regarding mediator's proposal.	500.00	0.7	350.00
03/02/2018	TOB	Adversary Proceeding	Telephone conference with L. Tirelli and C. Franklin regarding mediator's proposal.	500.00	1.2	600.00
03/02/2018	TOB	Adversary Proceeding	Telephone conference with L. Tirelli to break down mediator's proposal for C. Franklin.	500.00	1.5	750.00
03/02/2018	TOB	Adversary Proceeding	Email correspondence with OC and mediator regarding confidentiality language to be included in mediator's proposal.	500.00	0.6	300.00
03/05/2018	TOB	Adversary Proceeding	Email correspondence with L. Tirelli and client regarding responding to mediator's proposal.	500.00	0.3	150.00
03/05/2018	TOB	Adversary Proceeding	Telephone conference with L. Tirelli regarding mediator's proposal and upcoming call with C. Franklin.	500.00	0.2	100.00
03/05/2018	TOB	Adversary Proceeding	Telephone conference with client regarding mediator's proposal.	500.00	0.7	350.00
03/05/2018	TOB	Adversary Proceeding	Telephone conferences with R. Deitz and N. Schiavo regarding WF's failure to respond timely to mediator's proposal.	500.00	0.8	400.00

03/09/2018	TOB	Adversary Proceeding	Work with mediator, L. Tirelli, and opposing counsel to confirm agreement, accept mediator's proposal, and finalize terms of settlement/minor modifications to mediator's proposal.	500.00	2.0	1,000.00
03/12/2018	TOB	Adversary Proceeding	Conference with KLK and CNW regarding mediated settlement and next steps for getting agreement finalized and approved, preserving administrative claim for fees, and obtaining confirmation of Ch13 plan.	500.00	0.4	200.00
03/14/2018	RD	Adversary Proceeding	Review Judge Drain's calendar to check if pre-trial conference was canceled.	100.00	0.2	20.00
03/14/2018	TOB	Adversary Proceeding	Email correspondence with L. Tirelli regarding May setting for hearing on application to approve compromise.	500.00	0.2	100.00
03/22/2018	CNW	Adversary Proceeding	Instruct MP regarding preparation of fee application.	350.00	0.2	70.00
03/26/2018	TOB	Adversary Proceeding	Review draft of settlement agreement.	500.00	1.0	500.00
03/26/2018	MP	Adversary Proceeding	Attention to TO3 edits to settlement agreement.	100.00	0.3	30.00
03/26/2018	MP	Adversary Proceeding	Redline of TO3 edits to settlement agreement.	100.00	0.2	20.00
04/02/2018	TOB	Adversary Proceeding	Email correspondence with L. Tirelli regarding settlement draft.	500.00	0.1	50.00
05/09/2018	CNW	Adversary Proceeding	Research regarding requirements of fee applications and begin work on application.	350.00	1.8	630.00
05/11/2018	CNW	Adversary Proceeding	Continue work on fee application.	350.00	2.5	875.00
Non-billable Time Entries:						
11/04/2016	MA	Adversary Proceeding	Research on attorney admission requirements for Southern District of NY for TO3 admission, preparing application, conference with TO3 regarding details for the same.	100.00	0.7	70.00
11/14/2016	CNW	Adversary Proceeding	Prepare representation and co-counsel agreements.	350.00	0.5	175.00
11/14/2016	CNW	Adversary Proceeding	Attention to whether representation agreements have been executed.	350.00	0.2	70.00
11/14/2016	CNW	Adversary Proceeding	Set-up case in mycase and electronic case file.	350.00	0.1	35.00
11/14/2016	CNW	Adversary Proceeding	Edit representation and co-counsel agreements. Email correspondence with TO3 regarding same.	350.00	0.3	105.00
11/21/2016	KLK	Adversary Proceeding	Conference with TO3 regarding strategy with respect to WF request to amend claim; review district court opinion regarding same.	500.00	0.7	350.00
12/08/2016	TOB	Adversary Proceeding	Attention to admission paperwork for NYSD.	500.00	0.1	50.00
12/08/2016	MA	Adversary Proceeding	Finalizing application and paperwork for TO3 admission to SDNY, attention to White Plains courthouse admission requirements, mailing	100.00	0.5	50.00

12/27/2016	MFC	Adversary Proceeding	Research Haberman case for use in complaint.	250.00	0.1	25.00
12/27/2016	MFC	Adversary Proceeding	Conference with CNW regarding FCRA causes of action and complaint generally.	250.00	0.3	75.00
01/12/2017	TOB	Adversary Proceeding	Travel to NY for admission to SDNY.	250.00	7.0	1,750.00
01/13/2017	TOB	Adversary Proceeding	Admission (swearing in) to SDNY.	500.00	1.0	500.00
01/13/2017	TOB	Adversary Proceeding	Travel to Dallas from NY following admission to SDNY.	250.00	6.5	1,625.00
01/16/2017	TOB	Adversary Proceeding	Instruct CNW regarding admission to SDNY and need for ECF access to file in BK court for SDNY.	250.00	0.2	50.00
01/20/2017	CNW	Adversary Proceeding	Update co-counsel and representation agreements to reflect L. Tirelli's new firm.	350.00	0.4	140.00
01/20/2017	MA	Adversary Proceeding	Filing TO3 application for SDNY BK ECF log in.	100.00	0.2	20.00
02/21/2017	CNW	Adversary Proceeding	Attention to arranging TO3's telephonic appearance for the hearing on Wells Fargo's motion to amend.	350.00	0.4	140.00
02/21/2017	CNW	Adversary Proceeding	Instruct TGC regarding calendaring deadline to respond to motion to dismiss and motion to withdraw the reference.	350.00	0.2	70.00
02/21/2017	TGC	Calendaring	Calendar deadlines for motion to dismiss and motion to withdraw the reference.	100.00	0.2	20.00
02/22/2017	CNW	Adversary Proceeding	Prepare for and attend hearing telephonically on WF's motion to amend claim.	350.00	1.4	490.00
03/13/2017	MFC	Adversary Proceeding	Conference with TO3 regarding response to motion to withdraw reference.	250.00	0.4	100.00
03/14/2017	MFC	Adversary Proceeding	Conference with CNW regarding response to motion to withdraw reference.	250.00	0.4	100.00
03/17/2017	CNW	Adversary Proceeding	Attempt to pull docket sheet and obtain information for letter to court. SDNY website not responding.	350.00	0.6	210.00
03/24/2017	MFC	Adversary Proceeding	Conference with CNW and KLK regarding upcoming deadlines.	250.00	0.2	50.00
03/24/2017	KLK	Adversary Proceeding	Meeting with CNW regarding response to motion to dismiss and possible extension of response deadline.	500.00	0.2	100.00
03/27/2017	KLK	Adversary Proceeding	Conference with TO3 regarding extension of time to respond to motion for withdrawal of the reference.	500.00	0.2	100.00
03/31/2017	MFC	Adversary Proceeding	Conference with CNW regarding language in response to motion to withdraw reference.	250.00	0.1	25.00
03/31/2017	MFC	Adversary Proceeding	Review local rules regarding certificate of service.	250.00	0.2	50.00
04/03/2017	CNW	Adversary Proceeding	Prepare cover letter for courtesy copies to Court.	350.00	0.2	70.00
04/21/2017	CNW	Adversary Proceeding	Instruct TGC regarding sending courtesy copies of motion to court.	350.00	0.1	35.00

05/01/2017	CNW	Adversary Proceeding	Email correspondence with court clerk regarding TO3 appearing telephonically at hearing on confirmation and pre-trial conference.	350.00	0.4	140.00
05/02/2017	CNW	Adversary Proceeding	Attention to setting up court call appearance.	350.00	0.4	140.00
05/03/2017	KLK	Adversary Proceeding	Conference with TO3 regarding status, strategy with respect to motion to dismiss, response to same, and fact that hearing now moved to June 5, 2017.	500.00	0.4	200.00
05/26/2017	MA	Administration	Ordering/picking up lunch for response to motion to dismiss, travel to and from Beck's	100.00	0.5	50.00
06/02/2017	CNW	Adversary Proceeding	Prepare cover letter for courtesy copy to court.	350.00	0.2	70.00
06/02/2017	BDG	Adversary Proceeding	Preparation of hearing notebooks for TO3.	100.00	1.0	100.00
06/05/2017	KLK	Adversary Proceeding	Conference with TO3 regarding fact that Court denied Wells Fargo's motion to dismiss on all but one count.	500.00	0.3	150.00
06/14/2017	CNW	Adversary Proceeding	Review local rules regarding application to employ.	350.00	0.4	140.00
06/14/2017	CNW	Adversary Proceeding	Prepare application to employ and affidavit.	350.00	0.8	280.00
06/14/2017	CNW	Adversary Proceeding	Edit fee and co-counsel agreements to reflect L. Tirelli's new firm. Email to L. Tirelli regarding same.	350.00	0.6	210.00
06/14/2017	CNW	Adversary Proceeding	Conference with TO3 regarding new fee agreements and application to employ.	350.00	0.2	70.00
07/05/2017	CNW	Adversary Proceeding	Telephone conference with client and TO3 regarding damages.	350.00	0.8	280.00
07/06/2017	CNW	Adversary Proceeding	Prepare cover letter for courtesy copy to chambers.	350.00	0.2	70.00
09/12/2017	RD	Administration	Organize Franklin electronic file.	100.00	0.5	50.00
09/15/2017	RD	Administration	Conference with CNW about Franklin Discovery.	100.00	0.1	10.00
09/15/2017	KLK	Adversary Proceeding	Attention to issues of depositions and mediation.	500.00	0.2	100.00
09/18/2017	RD	Administration	Conference with CNW about Franklin Discovery.	100.00	0.5	50.00
10/03/2017	KLK	Adversary Proceeding	Conference with TO3 regarding proposed mediation and settlement.	500.00	0.2	100.00
12/05/2017	KLK	Adversary Proceeding	Review our mediation statement. (.2) Discuss mediation issues with TO3.(.2)	500.00	0.4	200.00
12/08/2017	KLK	Adversary Proceeding	Conference with TO3 regarding upcoming mediation. (.3) Conference with TO3 regarding call from court regarding Wells Fargo's motion to withdraw the reference. (.2)	500.00	0.5	250.00
12/11/2017	RD	Administration	Update hourly rates on all entries.	100.00	1.3	130.00
12/11/2017	RD	Adversary Proceeding	Prepare fee records for mediation.	100.00	1.0	100.00
12/11/2017	RD	Adversary Proceeding	Redact time records for mediation.	100.00	0.2	20.00

12/12/2017	RD	Adversary Proceeding	Attention to necessary mediation documents and mediation binder preparation.	100.00	3.1	310.00
12/13/2017	KLK	Adversary Proceeding	Conference with RD regarding Wells Fargo opinions.	500.00	0.1	50.00
12/13/2017	KLK	Adversary Proceeding	Conference with TO3 regarding mediation.	500.00	0.2	100.00
12/15/2017	KLK	Adversary Proceeding	Conference with CW regarding status of mediation.	500.00	0.1	50.00
01/19/2018	KLK	Adversary Proceeding	Conference with TO3 regarding status, strategy and settlement.	500.00	0.3	150.00

Totals: 432.1 \$159,290.00

Expenses

Date	EE	Activity	Description	Cost	Quantity	Line Total
11/21/2016	BDG	PACER Charges		31.10	1.0	31.10
12/18/2016	BDG	PACER Charges		24.80	1.0	24.80
12/19/2016	BDG	PACER Charges		5.30	1.0	5.30
12/19/2016	TOB	Research	Westlaw research	78.88	1.0	78.88
12/20/2016	BDG	PACER Charges		5.00	1.0	5.00
12/20/2016	TOB	Research	Westlaw research	78.88	1.0	78.88
12/21/2016	BDG	PACER Charges		1.10	1.0	1.10
12/27/2016	BDG	PACER Charges		1.00	1.0	1.00
01/20/2017	BDG	PACER Charges		0.20	1.0	0.20
01/20/2017	BDG	PACER Charges		4.30	1.0	4.30
02/10/2017	BDG	PACER Charges		3.00	1.0	3.00
02/20/2017	BDG	PACER Charges		8.60	1.0	8.60
02/22/2017	TOB	Conference Call	Court Conference/Court Call on 2/22/2017 10am Telephonic appearance at hearing on WF's Motion to Amend	37.00	1.0	37.00
02/22/2017	BDG	PACER Charges		1.10	1.0	1.10
03/13/2017	BDG	PACER Charges		2.90	1.0	2.90
03/14/2017	BDG	PACER Charges		2.60	1.0	2.60
03/17/2017	BDG	PACER Charges		0.60	1.0	0.60
03/21/2017	BDG	PACER Charges		3.70	1.0	3.70
03/27/2017	BDG	PACER Charges		2.10	1.0	2.10
03/29/2017	BDG	PACER Charges		0.30	1.0	0.30
03/31/2017	BDG	PACER Charges		1.40	1.0	1.40
04/12/2017	BDG	PACER Charges		3.70	1.0	3.70
04/19/2017	BDG	PACER Charges		0.20	1.0	0.20
04/25/2017	BDG	PACER Charges		3.50	1.0	3.50
04/26/2017	BDG	PACER Charges		0.40	1.0	0.40
04/27/2017	BDG	PACER Charges		3.10	1.0	3.10

04/28/2017	BDG	PACER Charges		0.30	1.0	0.30
04/28/2017	BDG	PACER Charges		1.80	1.0	1.80
05/01/2017	TOB	Research	Westlaw charges	16.10	1.0	16.10
05/01/2017	CNW	Research	Westlaw charges	2.93	1.0	2.93
05/01/2017	BDG	PACER Charges		0.40	1.0	0.40
05/02/2017	TOB	Research	Westlaw charges	7.56	1.0	7.56
05/02/2017	CNW	Research	Westlaw charges	13.43	1.0	13.43
05/02/2017	BDG	PACER Charges		0.20	1.0	0.20
05/03/2017	TOB	Conference Call	Court Conference - Court Call - Confirmation Hearing base price - adjust for final price	30.00	1.0	30.00
05/07/2017	TOB	Research	Westlaw charges	11.65	1.0	11.65
05/11/2017	BDG	PACER Charges		0.60	1.0	0.60
05/15/2017	TOB	Travel	MTD hearing - Southwest Airlines DAL-LGA-DAL 06/04/2017 - 06/05/2017	381.97	1.0	381.97
05/24/2017	CNW	Research	Westlaw charges	20.46	1.0	20.46
05/25/2017	TOB	Filing Fee	Certificate of Good Standing from NTX DC	19.00	1.0	19.00
05/25/2017	TOB	Adversary Proceeding	MTD Response meal Potbelly Sandwich	16.24	1.0	16.24
05/25/2017	TOB	Research	Westlaw charges	61.37	1.0	61.37
05/25/2017	CNW	Research	Westlaw charges	101.48	1.0	101.48
05/25/2017	BDG	PACER Charges		0.40	1.0	0.40
05/25/2017	TOB	Adversary Proceeding	MTD Response meal Blatt	36.08	1.0	36.08
05/26/2017	TOB	Adversary Proceeding	MTD meal Blue Sushi	65.49	1.0	65.49
05/26/2017	TOB	Research	Westlaw charges	41.62	1.0	41.62
05/26/2017	CNW	Research	Westlaw charges	61.64	1.0	61.64
05/26/2017	BDG	PACER Charges		10.70	1.0	10.70
06/02/2017	CNW	Research	Westlaw charges	77.05	1.0	77.05
06/02/2017	BDG	PACER Charges		1.00	1.0	1.00
06/05/2017	TOB	Travel	MTD meal with Co-counsel	125.23	1.0	125.23
06/05/2017	TOB	Travel	MTD meal Six Blocks Bakery Cafe	63.35	1.0	63.35
06/05/2017	TOB	Travel	MTD hearing hotel Crowne Plaza White Plains	226.73	1.0	226.73
06/05/2017	TOB	Travel	MTD Hearing car Hertz	83.97	1.0	83.97
06/05/2017	TOB	Travel	MTD travel meal Crowne Plaza	51.35	1.0	51.35
06/05/2017	BDG	PACER Charges		3.10	1.0	3.10
06/06/2017	TOB	Travel	MTD hearing - Uber airport to home	37.60	1.0	37.60
06/13/2017	TOB	Travel	MTD Hearing tolls Hertz	25.90	1.0	25.90
06/14/2017	CNW	Research	Westlaw charges	5.72	1.0	5.72
06/21/2017	TOB	Conference Call	Vast Conference Calling	1.08	1.0	1.08

07/05/2017	TOB	Conference Call	Vast Conference Calling	2.11	1.0	2.11
07/05/2017	CNW	Research	Westlaw Charges	12.14	1.0	12.14
07/05/2017	BDG	PACER Charges		4.50	1.0	4.50
07/24/2017	BDG	PACER Charges		0.90	1.0	0.90
08/22/2017	BDG	PACER Charges		27.20	1.0	27.20
08/30/2017	TOB	Travel	Rescheduled Mtn for Leave to Amend Southwest Airlines DAL-LGA-DAL 09/13-14/2017	224.95	1.0	224.95
09/11/2017	TOB	Travel	Franklin Depo NYC 09.13.2017-09.14.2017 - prepay Hotel Boutique at Grand Central	389.97	1.0	389.97
09/13/2017	TOB	Travel	Franklin Depo Uber airport to hotel	45.48	1.0	45.48
09/13/2017	TOB	Travel	Franklin Depo Uber home to airport	12.21	1.0	12.21
09/14/2017	TOB	Travel	Franklin Depo Uber White Plains to airport	72.08	1.0	72.08
09/14/2017	TOB	Travel	Franklin Depo meal LaGuardia Cafe	54.73	1.0	54.73
09/15/2017	TOB	Travel	Franklin Depo Uber airport to home	28.62	1.0	28.62
09/20/2017	BDG	PACER Charges		1.40	1.0	1.40
09/28/2017	TOB	Conference Call	Conference call with N. Schiavo and P. Riss to reschedule depo 09.26.2017	0.93	1.0	0.93
11/06/2017	TOB	Conference Call	Vast Conference Calling	1.88	1.0	1.88
11/07/2017	TOB	Conference Call	Vast Conference Calling	4.54	1.0	4.54
11/14/2017	BDG	PACER Charges		0.40	1.0	0.40
11/24/2017	TOB	Research	Westlaw charges	18.34	1.0	18.34
11/29/2017	CNW	Research	Westlaw charges	39.15	1.0	39.15
12/01/2017	TOB	Adversary Proceeding	Mediation Prep meal Nazca Kitchen	45.05	1.0	45.05
12/01/2017	TOB	Research	Westlaw	127.20	1.0	127.20
12/01/2017	TOB	Research	Westlaw	94.87	1.0	94.87
12/01/2017	CNW	Research	Westlaw	108.85	1.0	108.85
12/01/2017	BDG	PACER Charges		20.40	1.0	20.40
12/02/2017	TOB	Postage and Shipping	Mediation FedEx to N Schiavo at Hogan Lovell	83.36	1.0	83.36
12/02/2017	TOB	Postage and Shipping	Mediation FedEx to R Deitz mediator	83.36	1.0	83.36
12/05/2017	CNW	Research	Westlaw	109.87	1.0	109.87
12/07/2017	BDG	PACER Charges		8.90	1.0	8.90
12/08/2017	TOB	Travel	Mediation DFW-LGA-DFW 12/14/2017-12/16/2017 Ticket plus seat assignments American Airlines	434.48	1.0	434.48

12/08/2017	TOB	Conference Call	Call with client and mediator, TO3, CNW Vast Conference Calling	6.96	1.0	6.96
12/08/2017	TOB	Postage and Shipping	Mediation FedEx to R Deitz mediator	57.07	1.0	57.07
12/08/2017	CNW	Research	Westlaw	2.80	1.0	2.80
12/13/2017	TOB	Conference Call	Call with J Roman Vast Conference Calling	1.54	1.0	1.54
12/13/2017	CNW	Research	Westlaw	2.80	1.0	2.80
12/14/2017	TOB	Travel	Mediation - Travel meals Hilton Garden Inn - 12.14.2017-12.16.2017	89.04	1.0	89.04
12/14/2017	TOB	Research	Westlaw	84.37	1.0	84.37
12/14/2017	TOB	Travel	Mediation Queens Medallion - taxi	46.87	1.0	46.87
12/14/2017	TOB	Travel	Mediation GogoAir - wifi on plane	43.25	1.0	43.25
12/15/2017	TOB	Professional Fees	Mediation fees Roger M. Deitz	5,000.00	1.0	5,000.00
12/16/2017	TOB	Travel	Mediation in NYC Hilton Garden Inn 12.14.2017-12.16.2017	454.57	1.0	454.57
12/16/2017	TOB	Travel	Mediation - meal Einstein Bagel	10.10	1.0	10.10
12/16/2017	TOB	Travel	Mediation Taxi Service NY	48.07	1.0	48.07
01/04/2018	CNW	Research	Westlaw research	7.37	1.0	7.37
01/12/2018	TOB	Conference Call	Vast Conference Calling	2.17	1.0	2.17
01/26/2018	TOB	Research	Westlaw research	61.00	1.0	61.00
02/15/2018	BDG	PACER Charges	Mince v. Roundpoint	3.90	1.0	3.90
02/22/2018	BDG	PACER Charges		2.00	1.0	2.00
02/24/2018	TOB	Conference Call	Conferences with mediator and L. Tirelli and N. Schiavo regarding settlement possibilities. Vast Conference Calling	2.10	1.0	2.10
02/25/2018	TOB	Conference Call	Telephone conference with mediator and L. Tirelli regarding settlement / mediator's proposal. Vast Conference Calling	2.41	1.0	2.41
03/09/2018	TOB	Conference Call	Settlement discussion Vast Conference Calling	2.49	1.0	2.49

Expense Total: **\$9,897.01**

Time Entry Sub-Total:	159,290.00
Expense Sub-Total:	9,897.01
Sub-Total:	169,187.01
Total:	169,187.01
Amount Paid:	0.00
Balance Due:	\$169,187.01



Linda M Tirelli, Esq.
50 Main Street, Suite 405
White Plains NY 10606
(914)732-3222

August 31, 2018
 Invoice #: 176

Cynthia C. Franklin
 Cynthia C. Franklin
 126 Greenridge Ave
 White Plains, NY

Date	Staff	Description	Hours	Rate	Total
		Previous Balance			\$0.00
11/13/17	Brittany Odze, Paralegal	draft & post adjournment letter	0.50	\$200.00	\$100.00
01/12/18	Brittany Odze, Paralegal	Draft Affidavit of Service, Obj to POC No. 8	0.20	\$200.00	\$40.00
01/12/18	Brittany Odze, Paralegal	Draft Affidavit of Service, Motion for Sanction	0.20	\$200.00	\$40.00
07/12/18	Brittany Odze, Paralegal	serve amended ch 13	0.70	\$200.00	\$140.00
		Subtotal: Brittany Odze, Paralegal	1.60		\$320.00
02/28/17	Jenna Giorgi, Paralegal	A103 Draft/revise Draft and submit adjournment letter	0.10	\$200.00	\$20.00
07/25/17	Jenna Giorgi, Paralegal	A103 Draft/revise Adjournment letter	0.10	\$200.00	\$20.00
07/25/17	Jenna Giorgi, Paralegal	retrieve discovery from original case history, copy, organize, draft index discuss missing items, prior firm records and retrieval	8.00	\$200.00	\$1,600.00
07/26/17	Jenna Giorgi, Paralegal	Continue prep and search of past discovery email update to LT, respond to LT requests	4.30	\$200.00	\$860.00
08/25/17	Jenna Giorgi, Paralegal	A103 Draft/revise Drafted and filed notice of presentment for motion to amend	0.30	\$200.00	\$60.00
09/14/17	Jenna Giorgi, Paralegal	A111 Other Submitted proposed order RE motion to amend complaint	0.10	\$200.00	\$20.00
09/19/17	Jenna Giorgi, Paralegal	A111 Other Submitted Order to Judge RE Motion to Amend	0.10	\$200.00	\$20.00
09/21/17	Jenna Giorgi, Paralegal	A108 Communicate (other external) Phone call with Court RE Order for Motion to Amend	0.20	\$200.00	\$40.00
09/21/17	Jenna Giorgi, Paralegal	A111 Other Resubmit Order RE Motion to Amend	0.10	\$200.00	\$20.00
		Subtotal: Jenna Giorgi, Paralegal	13.30		\$2,660.00
09/19/16	Linda Tirelli, Esq. Partner	conference with client and discussion of co-counsel	1.60	\$375.00	\$600.00
09/28/16	Linda Tirelli, Esq. Partner	Read OC WF Obj to Confirmation of amended Plan email exchange to discuss with client, phone call with client	1.60	\$375.00	\$600.00
09/30/16	Linda Tirelli, Esq. Partner	read and analyze Order of US District Court (29 pages) research case law cited, email to client , call with client , review with colleague for interpretations	3.60	\$375.00	\$1,350.00

Date	Staff	Description	Hours	Rate	Total
09/30/16	Linda Tirelli, Esq. Partner	Draft outline Adversary Complaint against WF	4.20	\$375.00	\$1,575.00
10/02/16	Linda Tirelli, Esq. Partner	Proofread, edit, Adversary Complaint against WF	2.60	\$375.00	\$975.00
10/05/16	Linda Tirelli, Esq. Partner	Final draft Adversary Complaint against WF edit counts, confer with colleagues, prepare for filing post to ECF	3.70	\$375.00	\$1,387.50
11/04/16	Linda Tirelli, Esq. Partner	read and analyze motion to amend POC filed by OC for WF email exchange with client and Thad Bartholow (TB), research caselaw, review FN in USDC Order	2.60	\$375.00	\$975.00
11/14/16	Linda Tirelli, Esq. Partner	Phone conf w TB	0.30	\$375.00	\$112.50
11/15/16	Linda Tirelli, Esq. Partner	read and analyze Obj to conf of amended plan by OC for WF	1.20	\$375.00	\$450.00
12/05/16	Linda Tirelli, Esq. Partner	Phone conf w client	0.30	\$375.00	\$112.50
12/06/16	Linda Tirelli, Esq. Partner	Email exchange w TB review of oveall case and direction	1.10	\$375.00	\$412.50
12/18/16	Linda Tirelli, Esq. Partner	Email exchange w TB re lien avoidance	0.30	\$375.00	\$112.50
12/20/16	Linda Tirelli, Esq. Partner	Discussions w TB and client re timeline and history of the evils of Wells Fargo as to client, draft timeline	2.00	\$375.00	\$750.00
12/27/16	Linda Tirelli, Esq. Partner	Discussions w TB re amended complaint, read, edit research	3.60	\$375.00	\$1,350.00
12/29/16	Linda Tirelli, Esq. Partner	email discussions w TB re amended complaint exhibits	0.10	\$375.00	\$37.50
01/13/17	Linda Tirelli, Esq. Partner	meeting with TB in NY	1.30	\$375.00	\$487.50
01/25/17	Linda Tirelli, Esq. Partner	outline and draft objection to Motion to Amd POC by WF	3.30	\$375.00	\$1,237.50
02/12/17	Linda Tirelli, Esq. Partner	Edit second draft objection to Motion to Amd POC by WF research, confer with co counsel	2.00	\$375.00	\$750.00
02/20/17	Linda Tirelli, Esq. Partner	Final draft objection to Motion to Amd POC by WF serve on all parties, file on ECF	1.60	\$375.00	\$600.00
02/21/17	Linda Tirelli, Esq. Partner	prepare for hearing on 2/22 re Mot to Amd by OC / WF call with client, conf w TB	2.00	\$375.00	\$750.00
02/22/17	Linda Tirelli, Esq. Partner	attend hearing re Mot to Amd by OC / WF explain outcome and process to client	1.20	\$375.00	\$450.00
02/24/17	Linda Tirelli, Esq. Partner	Read and alayze WF Mot to Remove Reference email exchage with client, phone call with client, research, conf with TB, draft memo	2.40	\$375.00	\$900.00
03/01/17	Linda Tirelli, Esq. Partner	review order re mot to amend	0.10	\$375.00	\$37.50
03/07/17	Linda Tirelli, Esq. Partner	Conf with TB re Mot to W/draw reference /Opposition	1.30	\$375.00	\$487.50
03/24/17	Linda Tirelli, Esq. Partner	cor with TD re scheduling, case status	0.20	\$375.00	\$75.00
03/28/17	Linda Tirelli, Esq. Partner	review notice of payment change by WF, discuss w TB email to OC	1.30	\$375.00	\$487.50
03/30/17	Linda Tirelli, Esq. Partner	read , edit memo in opp to mot to remove reference	1.60	\$375.00	\$600.00
04/13/17	Linda Tirelli, Esq. Partner	email exchange with TB and conference, calls to client re pending MTD	0.60	\$375.00	\$225.00

Date	Staff	Description	Hours	Rate	Total
04/14/17	Linda Tirelli, Esq. Partner	read and analyze OC / WF memo reply (12 pages) to opp to motion to remove reference. Draft outline, call to client , email exchange w TB	2.30	\$375.00	\$862.50
04/15/17	Linda Tirelli, Esq. Partner	conf w TB re sur-reply to WF memo	0.20	\$375.00	\$75.00
04/26/17	Linda Tirelli, Esq. Partner	review edit, discuss sur-reply to WF memo	2.40	\$375.00	\$900.00
04/28/17	Linda Tirelli, Esq. Partner	review status letter filed by OC on ECF	0.30	\$375.00	\$112.50
05/02/17	Linda Tirelli, Esq. Partner	prepare for case status conference on 5/3/17 review case, conf w TB and Client	1.20	\$375.00	\$450.00
05/03/17	Linda Tirelli, Esq. Partner	Attend case status conference meeting with client and TB re conference	1.20	\$375.00	\$450.00
05/03/17	Linda Tirelli, Esq. Partner	research and provide substantive opinion to TB re the MTD and an already disallowed claim, call with colleague Tara Toomey	3.30	\$375.00	\$1,237.50
06/01/17	Linda Tirelli, Esq. Partner	proofread, edit, collaborate w TB respoinse to MTD	3.40	\$375.00	\$1,275.00
06/04/17	Linda Tirelli, Esq. Partner	prepare for court appearance w TB re MTD punchlist, outlines and organize case book	1.30	\$375.00	\$487.50
06/05/17	Linda Tirelli, Esq. Partner	Meet client for court appearance discuss status and outcome	0.60	\$375.00	\$225.00
06/05/17	Linda Tirelli, Esq. Partner	attend court appearance on wf MTD	1.00	\$375.00	\$375.00
06/30/17	Linda Tirelli, Esq. Partner	client meeting re damages, draft memo, outline, punchlist conference w TB re damages	3.60	\$375.00	\$1,350.00
07/05/17	Linda Tirelli, Esq. Partner	phone conference w TB discuss amendment to complaint ad JD's order draft file memo	1.00	\$375.00	\$375.00
07/05/17	Linda Tirelli, Esq. Partner	read, provide edits and intu , collaborate w TB re amended complant	0.00	\$375.00	\$0.00
07/24/17	Linda Tirelli, Esq. Partner	conferene w client re deposition to be scheduled discuss basis and how best to prepare, review case, review process with client	1.80	\$375.00	\$675.00
07/24/17	Linda Tirelli, Esq. Partner	phone conf w TB re WF discovery demands, draft file memo, discuss prior discovery exchange in original case, pull prior discovery exchange	1.40	\$500.00	\$700.00
07/25/17	Linda Tirelli, Esq. Partner	Draft and file adjournment letter on ECF coordinate adj w clerk and OC	1.00	\$375.00	\$375.00
07/29/17	Linda Tirelli, Esq. Partner	conf w TB re discovery	0.80	\$375.00	\$300.00
08/12/17	Linda Tirelli, Esq. Partner	conf with client review of rough discovery responses highlight and outline discovery prepared by client,	2.30	\$375.00	\$862.50
09/09/17	Linda Tirelli, Esq. Partner	work with client to prepare for deposition, review case, prepare for deposition, call with Nicole Schiavo re deposition, email to David Dunn	5.40	\$375.00	\$2,025.00
09/13/17	Linda Tirelli, Esq. Partner	prepare for deposition, cor with TB	1.00	\$375.00	\$375.00
09/13/17	Linda Tirelli, Esq. Partner	review and discuss R 26 disclosures	0.30	\$375.00	\$112.50
09/14/17	Linda Tirelli, Esq. Partner	Attend deposition of Cynthia Franklin meeting with client to discuss her testimony post-depositon	8.60	\$375.00	\$3,225.00
09/20/17	Linda Tirelli, Esq. Partner	assist w discovery requests, advse on discovery forwarded from initial case and trial. Read prior trial transcript and SJ transcript	3.60	\$375.00	\$1,350.00

Date	Staff	Description	Hours	Rate	Total
09/26/17	Linda Tirelli, Esq. Partner	phone conference w TB re discovery	0.30	\$375.00	\$112.50
10/03/17	Linda Tirelli, Esq. Partner	conference w Nicole Schiavo and TB re WF request for mediation call w TB re mediation proposal, recommendation to proceed w mediation, outline discussion to be had with client	1.20	\$375.00	\$450.00
10/05/17	Linda Tirelli, Esq. Partner	attend R 26 conference draft file memo	0.70	\$375.00	\$262.50
10/06/17	Linda Tirelli, Esq. Partner	research mediators in NYC / metro area	2.00	\$375.00	\$750.00
10/16/17	Linda Tirelli, Esq. Partner	prepare status update for court, review and discuss w TB	2.00	\$375.00	\$750.00
11/08/17	Linda Tirelli, Esq. Partner	Phone conf w mediator R Dietz (his intake process) review case going back to day 1, personal history, client history, strategy, professional history with TB, past experiences with WF and the Hogan Lovell firm, past cases and outcomes,	1.70	\$375.00	\$637.50
11/13/17	Linda Tirelli, Esq. Partner	review and comment on stipulation	0.70	\$375.00	\$262.50
11/13/17	Linda Tirelli, Esq. Partner	Draft and file adjournment letter on ECF coordinate scheduling of adjournment w OC and court	1.00	\$375.00	\$375.00
11/29/17	Linda Tirelli, Esq. Partner	work on mediation statement, conf w TB phone call with client	3.00	\$375.00	\$1,125.00
12/04/17	Linda Tirelli, Esq. Partner	Phone conf w TB re mediation	0.20	\$375.00	\$75.00
12/04/17	Linda Tirelli, Esq. Partner	Phone conf w TB and client re mediation	0.70	\$375.00	\$262.50
12/04/17	Linda Tirelli, Esq. Partner	Phone conf w TB and mediator (Dietz) re mediation	1.20	\$375.00	\$450.00
12/05/17	Linda Tirelli, Esq. Partner	discussion w client re damages, review damages documentation call with client's CPA	2.30	\$375.00	\$862.50
12/07/17	Linda Tirelli, Esq. Partner	phne conference w TB and client re mediation draft file memo	1.30	\$375.00	\$487.50
12/08/17	Linda Tirelli, Esq. Partner	read, edit, analyze mediation statement w exhibits by TB	2.40	\$375.00	\$900.00
12/08/17	Linda Tirelli, Esq. Partner	phone conferene w Dietz, Client, TB re mediation file memo	1.40	\$375.00	\$525.00
12/08/17	Linda Tirelli, Esq. Partner	unexpectd call from USDC Judge Roman, asking why there is a motion from WF if the claim is amended issue should be moot he asked "am i missing something?" LT couldnt agree more. Request to schedule a conference call for 12/12	0.30	\$375.00	\$112.50
12/08/17	Linda Tirelli, Esq. Partner	emaiil xchange w Nicole Schiavo, David Dunn and TB re call from J Romano and reque for a cophone conference on 12/12. coordinate schedules and respond to the court	1.30	\$375.00	\$487.50
12/10/17	Linda Tirelli, Esq. Partner	phone conferene w mediator re various aspects of case and mediation clarification on history and WF. Draft file memo	1.40	\$375.00	\$525.00
12/12/17	Linda Tirelli, Esq. Partner	attend phne conference w USC J Roman , Nicole, David Dunn, TB	0.30	\$375.00	\$112.50
12/14/17	Linda Tirelli, Esq. Partner	prepare notebooks for mediation, conf w TB	3.00	\$375.00	\$1,125.00
12/15/17	Linda Tirelli, Esq. Partner	prepare and attend mediation conference, meeting w client immediately after	11.50	\$375.00	\$4,312.50

Date	Staff	Description	Hours	Rate	Total
12/15/17	Linda Tirelli, Esq. Partner	travel to and from mediation (1/2 rate) holiday traffic, snow	3.40	\$187.50	\$637.50
12/18/17	Linda Tirelli, Esq. Partner	phone conf w TB and mediator Dietz re mediation follow up	1.20	\$375.00	\$450.00
12/27/17	Linda Tirelli, Esq. Partner	Review Review File, POC, outline objection to second amended POC, research	4.50	\$375.00	\$1,687.50
12/28/17	Linda Tirelli, Esq. Partner	Draft Motion Draft objection to 2nd amendment POC	3.70	\$375.00	\$1,387.50
01/02/18	Linda Tirelli, Esq. Partner	Draft Motion redraft and edit objection to POC and Motion for sanctions	3.40	\$375.00	\$1,275.00
01/02/18	Linda Tirelli, Esq. Partner	re-Draft, edit Motion	2.40	\$375.00	\$900.00
01/02/18	Linda Tirelli, Esq. Partner	phone conf w mediator Dietz re mediation re questions and input	1.00	\$375.00	\$375.00
01/10/18	Linda Tirelli, Esq. Partner	review & outline issues for mediator proposal, call to client	1.40	\$500.00	\$700.00
01/12/18	Linda Tirelli, Esq. Partner	email exchange w tb and mediator	0.20	\$500.00	\$100.00
01/12/18	Linda Tirelli, Esq. Partner	email exchange re drated motions, edits etc w TB	0.40	\$375.00	\$150.00
01/12/18	Linda Tirelli, Esq. Partner	phne call with mediator and TB	0.60	\$375.00	\$225.00
01/15/18	Linda Tirelli, Esq. Partner	phine conference w Dietz re settlement proposal numbers discussion continued	1.30	\$500.00	\$650.00
01/17/18	Linda Tirelli, Esq. Partner	phone call w TB re Dietz and settlement	0.20	\$500.00	\$100.00
01/17/18	Linda Tirelli, Esq. Partner	review letter from OC re USDC and stand still, email exchange w TB	0.40	\$500.00	\$200.00
01/17/18	Linda Tirelli, Esq. Partner	email exchange w/ TB re strategy in USDC proceedings	0.40	\$375.00	\$150.00
01/17/18	Linda Tirelli, Esq. Partner	phone call w/ TB re Dunn emailand letter	0.30	\$375.00	\$112.50
01/17/18	Linda Tirelli, Esq. Partner	review email from OC re status to USDC	0.20	\$375.00	\$75.00
01/19/18	Linda Tirelli, Esq. Partner	phne call with Dietz re case, settlement and his prior call w TB and Nicole	2.70	\$375.00	\$1,012.50
01/25/18	Linda Tirelli, Esq. Partner	review client emails and calculate home expenses	2.60	\$375.00	\$975.00
01/26/18	Linda Tirelli, Esq. Partner	correspondence with client regarding home expenses	1.30	\$375.00	\$487.50
02/01/18	Linda Tirelli, Esq. Partner	cor with client re new trsustee and answer qu re case and trustee	0.20	\$500.00	\$100.00
02/21/18	Linda Tirelli, Esq. Partner	review letter filed by OC on ECF	0.20	\$375.00	\$75.00
02/22/18	Linda Tirelli, Esq. Partner	cor w TB re fees amt previously approved, TT holdings research amounts held by TT, email with TT's atty	1.00	\$375.00	\$375.00
02/23/18	Linda Tirelli, Esq. Partner	number crunching with TB re fees and settlement	0.60	\$375.00	\$225.00
02/24/18	Linda Tirelli, Esq. Partner	call with mediator re his additional questions and	1.60	\$375.00	\$600.00
02/24/18	Linda Tirelli, Esq. Partner	call with TB re mediator calls and dollars amounts for settlement	0.40	\$375.00	\$150.00
03/02/18	Linda Tirelli, Esq. Partner	read an analyze mediator's drafted proposal call with TB	1.40	\$375.00	\$525.00
03/05/18	Linda Tirelli, Esq. Partner	phone call with client and TB re mediator proposal draft file memo	1.60	\$500.00	\$800.00

Date	Staff	Description	Hours	Rate	Total
03/05/18	Linda Tirelli, Esq. Partner	phone call with TB in advance of call with client re mediator proposal	0.20	\$375.00	\$75.00
03/09/18	Linda Tirelli, Esq. Partner	email exchnage w OCs and TB and Dietz re court clerk response to collective questions on timing, marking off hearing dates and scheduling hearing dates	1.00	\$375.00	\$375.00
03/09/18	Linda Tirelli, Esq. Partner	conference with meditaor, OCs, TB discussion to accept proosal, fine tune , finalize terms	2.30	\$375.00	\$862.50
03/12/18	Linda Tirelli, Esq. Partner	conference with client and TB discuss numbers, settlement and obligations to confirm a ch 13 case	0.60	\$375.00	\$225.00
03/20/18	Linda Tirelli, Esq. Partner	final conference call with Dietz, OCs, TB with parties agreeing to numbers and all terms. draft file memo, call to client	1.30	\$375.00	\$487.50
03/26/18	Linda Tirelli, Esq. Partner	read and edit settlement agreement proposed	4.60	\$375.00	\$1,725.00
04/02/18	Linda Tirelli, Esq. Partner	email w TB re settlement draft	0.10	\$375.00	\$37.50
04/03/18	Linda Tirelli, Esq. Partner	read Notice of Mtg Pmt Change filed by WF draft letter to atty who filed the notice demand retraction, forward all to Nicole Schiavo, cc to TB	2.00	\$375.00	\$750.00
06/10/18	Linda Tirelli, Esq. Partner	Draft fee application with TB	2.00	\$375.00	\$750.00
07/01/18	Linda Tirelli, Esq. Partner	Draft and circulate proposed motion to approve compromise and multiple stipulations, curculate, review comments,	6.00	\$375.00	\$2,250.00
07/07/18	Linda Tirelli, Esq. Partner	phn call with Nicole Schiavo re stiptions and verbiage and need for a signature from Freddie Mac in addition to WF as co-defendant, edit and revise	2.60	\$375.00	\$975.00
07/07/18	Linda Tirelli, Esq. Partner	phone call with IRS re POC resolution, draft email negotiate and resolve the POC for amended plan	1.30	\$375.00	\$487.50
07/09/18	Linda Tirelli, Esq. Partner	edit and redraft portions of final fee app go over numbers and discussion w client and TB	3.00	\$375.00	\$1,125.00
07/11/18	Linda Tirelli, Esq. Partner	final draft and file Motion to Approve compromise file and serve	1.60	\$375.00	\$600.00
07/12/18	Linda Tirelli, Esq. Partner	file final fee app discussion, reconcile glitch with accounting prog email to trustee and UST	1.60	\$375.00	\$600.00
07/19/18	Linda Tirelli, Esq. Partner	meeting with client re DSO form, final amended ch 13 plan and fee app	1.30	\$375.00	\$487.50
07/24/18	Linda Tirelli, Esq. Partner	prepare for court hearing on motion to approve compromise	1.00	\$375.00	\$375.00
07/25/18	Linda Tirelli, Esq. Partner	attend court hearing on motion to approve comproise, meeting w/ client, discuss IRS claim resolution w Trustee, status report to court	1.30	\$375.00	\$487.50
07/25/18	Linda Tirelli, Esq. Partner	submt order with full agreements posted to ECF	1.60	\$375.00	\$600.00
07/27/18	Linda Tirelli, Esq. Partner	revi court order approving compromise forward copy to client	0.40	\$375.00	\$150.00
		Subtotal: Linda Tirelli, Esq. Partner	210.00		\$78,950.00
		Amount Due	224.90		\$81,930.00

Thank You!

Date	EE	Expense	Cost	Description
12/19/2016	Thad O. Bartholow III	Research	\$78.88	Westlaw research
12/20/2016	Thad O. Bartholow III	Research	\$78.88	Westlaw research
2/22/2017	Thad O. Bartholow III	Conference Call	\$37.00	Court Conference/Court Call on 2/22/2017 10am Telephonic appearance at hearing on WF's Motion to Amend
5/1/2017	Thad O. Bartholow III	Research	\$16.10	Westlaw charges
5/2/2017	Thad O. Bartholow III	Research	\$7.56	Westlaw charges
5/3/2017	Thad O. Bartholow III	Conference Call	\$30.00	Court Conference - Court Call - Confirmation Hearing base price - adjust for final price
5/7/2017	Thad O. Bartholow III	Research	\$11.65	Westlaw charges
5/15/2017	Thad O. Bartholow III	Travel	\$381.97	MTD hearing - Southwest Airlines DAL-LGA-DAL 06/04/2017 - 06/05/2017
5/25/2017	Thad O. Bartholow III	Filing Fee	\$19.00	Certificate of Good Standing from NTX DC
5/25/2017	Thad O. Bartholow III	Research	\$61.37	Westlaw charges
5/26/2017	Thad O. Bartholow III	Research	\$41.62	Westlaw charges
6/5/2017	Thad O. Bartholow III	Travel	\$226.73	MTD hearing hotel Crowne Plaza White Plains
6/5/2017	Thad O. Bartholow III	Travel	\$83.97	MTD Hearing car Hertz
6/6/2017	Thad O. Bartholow III	Travel	\$37.60	MTD hearing - Uber airport to home
6/13/2017	Thad O. Bartholow III	Travel	\$25.90	MTD Hearing tolls Hertz
6/21/2017	Thad O. Bartholow III	Conference Call	\$1.08	Vast Conference Calling
7/5/2017	Thad O. Bartholow III	Conference Call	\$2.11	Vast Conference Calling

8/30/2017	Thad O. Bartholow III	Travel	\$224.95	Rescheduled Mtn for Leave to Amend Southwest Airlines DAL-LGA-DAL 09/13-14/2017
9/28/2017	Thad O. Bartholow III	Conference Call	\$0.93	Conference call with N. Schiavo and P. Riss to reschedule depo 09.26.2017
11/6/2017	Thad O. Bartholow III	Conference Call	\$1.88	Vast Conference Calling
11/7/2017	Thad O. Bartholow III	Conference Call	\$4.54	Vast Conference Calling
11/24/2017	Thad O. Bartholow III	Research	\$18.34	Westlaw charges
12/1/2017	Thad O. Bartholow III	Research	\$127.20	Westlaw
12/1/2017	Thad O. Bartholow III	Research	\$94.87	Westlaw
12/2/2017	Thad O. Bartholow III	Postage and Shipping	\$83.36	Mediation FedEx to R Deitz mediator
12/8/2017	Thad O. Bartholow III	Travel	\$434.48	Mediation DFW-LGA-DFW 12/14/2017-12/16/2017 Ticket plus seat assignments American Airlines
12/8/2017	Thad O. Bartholow III	Conference Call	\$6.96	Call with client and mediator, TO3, CNW Vast Conference Calling
12/8/2017	Thad O. Bartholow III	Postage and Shipping	\$57.07	Mediation FedEx to R Deitz mediator
12/13/2017	Thad O. Bartholow III	Conference Call	\$1.54	Call with J Roman Vast Conference Calling
12/14/2017	Thad O. Bartholow III	Travel	\$89.04	Mediation - Travel meals Hilton Garden Inn - 12.14.2017-12.16.2017
12/14/2017	Thad O. Bartholow III	Research	\$84.37	Westlaw

12/14/2017	Thad O. Bartholow III	Travel	\$46.87	Mediation Queens Medallion - taxi
12/14/2017	Thad O. Bartholow III	Travel	\$43.25	Mediation GogoAir - wifi on plane
12/15/2017	Thad O. Bartholow III	Professional Fees	\$5,000.00	Mediation fees Roger M. Deitz
12/16/2017	Thad O. Bartholow III	Travel	\$454.57	Mediation in NYC Hilton Garden Inn 12.14.2017- 12.16.2017
12/16/2017	Thad O. Bartholow III	Travel	\$48.07	Mediation Taxi Service NY
1/12/2018	Thad O. Bartholow III	Conference Call	\$2.17	Vast Conference Calling
1/26/2018	Thad O. Bartholow III	Research	\$61.00	Westlaw research
2/24/2018	Thad O. Bartholow III	Conference Call	\$2.10	Conferences with mediator and L. Tirelli and N. Schiavo regarding settlement possibilities. Vast Conference Calling
2/25/2018	Thad O. Bartholow III	Conference Call	\$2.41	Telephone conference with mediator and L. Tirelli regarding settlement / mediator's proposal. Vast Conference Calling
3/9/2018	Thad O. Bartholow III	Conference Call	\$2.49	Settlement discussion Vast Conference Calling
11/21/2016	Beverly D. Geise	PACER Charges	\$31.10	
12/18/2016	Beverly D. Geise	PACER Charges	\$24.80	
12/19/2016	Beverly D. Geise	PACER Charges	\$5.30	
12/20/2016	Beverly D. Geise	PACER Charges	\$5.00	
12/21/2016	Beverly D. Geise	PACER Charges	\$1.10	
12/27/2016	Beverly D. Geise	PACER Charges	\$1.00	

1/20/2017	Beverly D. Geise	PACER Charges	\$0.20	
1/20/2017	Beverly D. Geise	PACER Charges	\$4.30	
2/10/2017	Beverly D. Geise	PACER Charges	\$3.00	
2/20/2017	Beverly D. Geise	PACER Charges	\$8.60	
2/22/2017	Beverly D. Geise	PACER Charges	\$1.10	
3/13/2017	Beverly D. Geise	PACER Charges	\$2.90	
3/14/2017	Beverly D. Geise	PACER Charges	\$2.60	
3/17/2017	Beverly D. Geise	PACER Charges	\$0.60	
3/21/2017	Beverly D. Geise	PACER Charges	\$3.70	
3/27/2017	Beverly D. Geise	PACER Charges	\$2.10	
3/29/2017	Beverly D. Geise	PACER Charges	\$0.30	
3/31/2017	Beverly D. Geise	PACER Charges	\$1.40	
4/12/2017	Beverly D. Geise	PACER Charges	\$3.70	
4/19/2017	Beverly D. Geise	PACER Charges	\$0.20	
4/25/2017	Beverly D. Geise	PACER Charges	\$3.50	
4/26/2017	Beverly D. Geise	PACER Charges	\$0.40	
4/27/2017	Beverly D. Geise	PACER Charges	\$3.10	
4/28/2017	Beverly D. Geise	PACER Charges	\$0.30	
4/28/2017	Beverly D. Geise	PACER Charges	\$1.80	
5/1/2017	Beverly D. Geise	PACER Charges	\$0.40	
5/2/2017	Beverly D. Geise	PACER Charges	\$0.20	
5/11/2017	Beverly D. Geise	PACER Charges	\$0.60	
5/25/2017	Beverly D. Geise	PACER Charges	\$0.40	
5/26/2017	Beverly D. Geise	PACER Charges	\$10.70	
6/2/2017	Beverly D. Geise	PACER Charges	\$1.00	
6/5/2017	Beverly D. Geise	PACER Charges	\$3.10	
7/5/2017	Beverly D. Geise	PACER Charges	\$4.50	
7/24/2017	Beverly D. Geise	PACER Charges	\$0.90	
8/22/2017	Beverly D. Geise	PACER Charges	\$27.20	
9/20/2017	Beverly D. Geise	PACER Charges	\$1.40	
11/14/2017	Beverly D. Geise	PACER Charges	\$0.40	
12/1/2017	Beverly D. Geise	PACER Charges	\$20.40	
12/7/2017	Beverly D. Geise	PACER Charges	\$8.90	
2/22/2018	Beverly D. Geise	PACER Charges	\$2.00	
5/11/2018	Beverly D. Geise	PACER Charges	\$4.60	
5/11/2018	Beverly D. Geise	PACER Charges	\$0.30	
5/24/2018	Beverly D. Geise	PACER Charges	\$1.40	
5/1/2017	Caitlyn N. Wells	Research	\$2.93	Westlaw charges
5/2/2017	Caitlyn N. Wells	Research	\$13.43	Westlaw charges
5/24/2017	Caitlyn N. Wells	Research	\$20.46	Westlaw charges
5/25/2017	Caitlyn N. Wells	Research	\$101.48	Westlaw charges
5/26/2017	Caitlyn N. Wells	Research	\$61.64	Westlaw charges
6/2/2017	Caitlyn N. Wells	Research	\$77.05	Westlaw charges

6/14/2017	Caitlyn N. Wells	Research	\$5.72	Westlaw charges
7/5/2017	Caitlyn N. Wells	Research	\$12.14	Westlaw Charges
11/29/2017	Caitlyn N. Wells	Research	\$39.15	Westlaw charges
12/1/2017	Caitlyn N. Wells	Research	\$108.85	Westlaw
12/5/2017	Caitlyn N. Wells	Research	\$109.87	Westlaw
12/8/2017	Caitlyn N. Wells	Research	\$2.80	Westlaw
12/13/2017	Caitlyn N. Wells	Research	\$2.80	Westlaw
1/4/2018	Caitlyn N. Wells	Research	\$7.37	Westlaw research
5/23/2018	Caitlyn N. Wells	Research	\$20.74	Westlaw charges
		TOTAL:	\$8,820.81	